♦ Cater Allen Private Bank

Please keep for future reference



Using my personal data

How we use your personal data

When you applied for an account with Cater Allen you will have been given a Data Protection Statement, explaining how we would treat your personal data.

This booklet provides you with more information about this, together with details of your personal data rights.

Contents

The Data Protection Statement explained	2
Fraud prevention agencies explained	5
Credit reference agencies explained	6
Your personal data rights explained	6
Glossary of terms	10

1. The Data Protection Statement explained

Data Protection Statement section	Explanation
Introduction	This section sets out who the Data Controller is and provides contact details for the Data Protection Officer. In legal terms Cater Allen is designated as the Data Controller because it is the entity that (either alone or jointly with others) determines the purposes and means of the processing of your personal data.
	If you have any questions about how your personal data is used, or the information included in this booklet, our Data Protection Officer (DPO) can be contacted at 201 Grafton Gate East, Milton Keynes, MK9 1AN.
The types of personal data we collect and use	The sort of personal data we collect and use will vary depending on the account(s) you require or have, and your preferred relationship with us. For instance, biometric data would be captured if you registered your fingerprints for Internet Banking, or your voice recordings for voice-activated banking.
Whether providing your personal data is required by law or contract or not	This section states that you'll be told whether the provision of your personal data is optional or mandatory. If the provision of the data is mandatory and we don't already hold it then you'll need to provide the information so that we can process your application or service.
Monitoring of communications	This section explains why we may monitor your on-going communications with us. This includes us monitoring our communications with you so that we comply with regulatory rules, or our own internal processes and protocols: • relevant to our business and the services we provide;
	 to prevent or detect crime; in the interests of protecting the security of our communications systems and procedures; for quality control and staff training purposes; and when we need to access these as a record of what we have said to you/what you have said to us.
	For example, where we are required by Financial Conduct Authority (FCA) regulations to record certain telephone lines we will do so. Our monitoring will also check for obscene or profane content in communications.
	In very limited and controlled circumstances we may conduct short-term and carefully controlled monitoring of activities on your account. This will only be done where this is necessary for our legitimate interests, or to comply with legal obligations - for example, if we have reason to believe that a fraud or other crime is being committed, and/or where we suspect non-compliance with antimoney laundering regulations to which we are subject.
Using your personal data: the legal basis and purposes	This section describes how your personal data may be used, and the legal basis for the processing of your information. The legal basis for us processing or analysing your personal data will depend on what we're trying to achieve. Data Protection legislation allows us to process your personal data for our own legitimate interests – provided those interests don't override your own interests and/or your fundamental rights and freedoms.
	An example of 'legitimate interests' would be if you believed you were the victim of a fraud or scam, and you asked us to investigate your claim. To understand what has happened we may need to share your name and account number, the details of any payment(s) made and details of the case with the other bank(s) involved, so they could trace transactional activity, help to recover any of your monies that may remain and reduce the opportunity of the funds being used to support criminal activity. Therefore, the sharing of your data with the bank(s) involved falls within your legitimate interests as well as ours - to ensure that funds are prevented from being used for fraudulent and/or money laundering activities. Please note: The bank(s) we may share your data with may be located outside of the UK or European Economic Area (EEA), and therefore may not be subject to the same data privacy legal obligations as banks within the UK or EEA.
	Complying with established legal obligations is another reason for us to share your personal data. For example if you require us to transfer funds via CHAPS or internationally, your personal data may be provided to overseas authorities and the beneficiary bank to comply with applicable legal obligations and to prevent crime. This may require us to share your personal data outside of the UK or EEA. This information may include your full name, address, date of birth and account number - and by making your payment instructions to us, you consent to us sharing personal information to overseas authorities and beneficiary bank(s) as appropriate.

Data Protection Statement section	Explanation
Using your personal data: the legal basis and purposes (continued)	 Consent for processing of special categories of personal data, at your request, must be explicit. For example: (i) If we require a copy of your passport (as a new customer) and if that reveals your racial or ethnic origin data, by providing a copy you will be explicitly consenting to us seeing your racial or ethnic origin in this way. (ii) If you volunteer data concerning your health when we ask you about the conduct of your account you will be explicitly consenting to us processing this personal data in connection with your account. Under Data Protection legislation you can withdraw your consent at any time. If you do this, and if there is no alternative lawful reason that justifies our processing of your personal data for a particular purpose, this may affect what we can do for you. For example, it may mean that if you have arrears on your account, we can't take into account any personal data concerning your health, which may result in us being unable to provide you with a service that you had requested.
Sharing of your personal data	This section details when personal data may be shared, and the types of people/organisations it can be shared with. We may share your personal information with companies and other persons providing services to us. This may include data back-up and server hosting providers, our IT software and maintenance providers, and/or their agents. Where a joint account is converted into a sole account, information about the account and historical transactions will be available to all current and any future account holders added to the account. If you ask another person or organisation to act on your behalf we will share relevant personal information with them to enable them to deal with your request. For example, if you refer a complaint about us to the Financial Ombudsman Service, we will share relevant complaint information with them so that they can review your case. In some cases this may include special categories of personal data (i.e. data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, or data relating to health, sex life/sexual orientation) where it is relevant to the complaint. The Santander group companies that we may share personal data with include Banco Santander, S.A.; Santander Group companies that we may share personal data with include Banco Santander, S.A.; Santander UK plc (including cahoot); Santander ISA Managers Ltd; Santander Asset Finance plc; Alliance & Leicester Personal Finance Ltd; Cater Allen Ltd (Cater Allen); Santander Asset Finance plc; Santander Corporate and Commercial, a brand name of Santander UK plc (which also uses the brand name Santander Corporate and Investment Banking) and of Santander Asset Finance plc; Santander Insurance Services UK Ltd and Asto Digital Limited.
International transfers	This section explains that where we transfer your personal data outside of the UK and European Economic Area (EEA) appropriate safeguards will be put in place to protect that data. Safeguards can include: (i) The Standard Data Protection Clauses (also known as EU Model Clauses). You can obtain a copy of these by contacting our Data Protection Officer (DPO). (ii) Binding Corporate Rules, provided the recipients in other countries have obtained the requisite approvals. The published list of approvals is available here: ec.europa.eu/justice/data-protection/international-transfers/binding-corporate-rules/bcr_cooperation/index_en.htm or from our Data Protection Officer (DPO).
Identity verification and fraud prevention checks	This section explains that your personal data can be used to check your identity and for fraud prevention and anti-money laundering purposes. To find out more, refer to the 'Fraud prevention agencies explained' section of this booklet.
Credit reference checks	This section provides information on the sharing of your personal data with the credit reference agencies. To find out more, refer to the 'Credit reference agencies explained' section of this booklet.
Your marketing preferences and related searches	This section tells you how we may use your information for marketing and market research purposes. You can tell us at any time that you don't want to receive marketing or market research requests. You can provide your specific marketing preferences as part of your application. Equally you can contact us at any time to provide and/or update those preferences.
Automated decision making and processing	This section explains what automated decision making is, and the circumstances when it may take place. We may automatically process your personal data, without human intervention, to evaluate certain personal aspects about you (known as profiling). In particular, we may analyse or predict (among other things) your economic situation, personal preferences, interests or behaviour. This could mean that automated decisions are made about you using your personal information. For example, we might analyse certain customer demographics, account holdings and account behaviours (such as Direct Debits you have set up on your accounts including those which identify accounts and products such as credit cards and store cards which you hold with other providers/elsewhere) and look at details of transactions relevant to your accounts. We may also analyse events such as the maturity dates of your accounts and opening anniversaries.

Data Protection Statement section	Explanation
Automated decision making and processing (continued)	In some instances we'll use automated processing and decision making, where relevant, to decide which of our other products or services might be suitable for you, as well as to produce a personalised price for insurance products, to provide an indication of the price prior to an application being made (please note, publicly available information about you and information about you from third party data sources such as, credit reference agencies, will also be used to provide you with an indication of the price). The personalised price would be presented to you in marketing communications and during contacts with Santander that might be suitable. We'll look at the types of accounts that you already have with us, as well as your age, where this is relevant to the product, we think you might be interested in. We'll also conduct behavioural scoring, including by looking at the accounts and products you already have with us and how they are being used, such as account turnover, arrears and other indications of financial difficulties. Where searches are carried out against publicly available data sources and credit reference agencies, these searches may appear on your credit report, but they will not affect your ability to get credit.
	You may have a right to certain information about how we make these decisions. You may also have a right to request human intervention and to challenge the decision. For some insurance products we may use automated decision making to assist the insurer in determining your final insurance premium. The insurer will use an automated underwriting engine to process your personal information and to better assess insurance risk which will generally provide a more accurate price that is relevant to your individual circumstances and needs. The automated underwriting engine will use information including personal information that you provide as well as other information about you held by us, the insurer and other parties. Where the insurer is carrying out any automated decision making it will do so on the basis that is necessary in order for the insurer to enter into the insurance contract with you. You have the right to contest that decision, express your point of view and ask for a human review. Where we carry out any automated decision making for your insurance product, we will ask for your consent during the application process to allow us to do so. You may withdraw your consent at any time.
Criteria used to determine retention periods	This section within the data protection statement explains the criteria we use when deciding how long personal data needs to be retained.
Your rights under applicable Data Protection law	This section lists the various data protection rights that you have. Your personal data is protected under Data Protection legislation, and as a consequence you have a number of rights that you can enforce against us as your Data Controller. Please note that these rights do not apply in all circumstances. Your rights include: The right to be informed - including about how we might process your personal data. This was
	 provided to you in the data protection statement. To have your personal data corrected if it is inaccurate and to have incomplete personal data completed in certain circumstances.
	 The right (in some cases) to object to processing of your personal data (as relevant). This right allows individuals in certain circumstances to object to processing based on legitimate interests, direct marketing (including profiling) and processing for purposes of statistics.
	• The right in some cases to restrict processing of your personal data , for instance where you contest it as being inaccurate (until the accuracy is verified); where you consider that the processing is unlawful and where this is the case; and where you request that our use of it is restricted; or where we no longer need the personal data.
	• The right to have your personal data erased in certain circumstances (also known as the 'right to be forgotten'). This right is not absolute – it applies only in particular circumstances, and where it does not apply, any request for erasure will be rejected. Circumstances when it might apply include: where the personal data 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 subsequently withdraw; when there is no overriding legitimate interest for continuing the processing; if the personal data is unlawfully processed; or if the personal data has to be erased to comply with a legal obligation. Requests for erasure will be refused where that is lawful and permitted under Data Protection law, for instance where the personal data has to be retained to comply with legal obligations, or to exercise or defend legal claims.
	 To request access to the personal data held about you and to obtain certain prescribed information about how we process it. This is more commonly known as submitting a 'data subject access request'. This right will enable you to obtain confirmation that your personal data is being processed, to obtain access to it, and to obtain other supplementary information about how it is processed. In this way you can be aware of, and you can verify, the lawfulness of our processing of your personal data.
	• To move, copy or transfer certain personal data. Also known as 'data portability'. You can do this where your account is open and where we are processing your personal data based on consent or a contract and by automated means. Please note that this right is different from the right of access (see above), and that the types of data you can obtain under these two separate rights may be different. You are not able to obtain through the data portability right all of the personal data that you can obtain

through the right of access.

decision is taken without human intervention.

• **Rights in relation to some automated decision-making about you, including profiling** (as relevant) if this has a legal or other significant effect on you as an individual. This right allows individuals, in certain circumstances, to access certain safeguards against the risk that a potentially damaging

Data Protection Statement section	Explanation
Your rights under applicable Data Protection law (continued)	 To complain to the Information Commissioner's Office (ICO), the UK's independent body empowered to investigate whether we are complying with the Data Protection law. You can do this if you consider that we have infringed the legislation in any way. You can visit ico.org.uk for more information.
	If you seek to exercise any of your rights against us we'll explain whether or not that right or those rights do or don't apply to you with reference to the above, and based on the precise circumstances of your request.
Data anonymisation and aggregation	This section explains that your personal data may be turned into statistical or aggregated data, data that can no longer identify you.
	Your personal data may be converted into statistical or aggregated data, which can't be used to identify you. We may share and sell such anonymised data including in an aggregated format, within and outside of the Santander group of companies, for statistical analysis, research and other business purposes. For example, sharing information about general spending trends in the UK to assist in research. The law says this is not considered to be personal information after it has been anonymised and/or aggregated.

2. Fraud prevention agencies explained

Before we provide financial services and/or financing to you, we undertake a series of checks - not only to verify your identity, but also to prevent fraud or money laundering. These checks require us to process your personal data.

What we process and share

The personal data we process and share is what you've provided us with, details we've collected from you directly, and/or information we've received from third parties. This may include your:

- Name
- Date of birth
- Residential address and address history
- Proximity checking
- Contact details, such as email addresses and telephone numbers
- Financial information
- Employment details
- o Identifiers assigned to your computer or other internet connected devices, including your Internet Protocol (IP) address
- Vehicle details

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

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

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.

Automated decision making

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

- o our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions/activity; or
- o you appear to have deliberately hidden your true identity.

You have certain rights in relation to automated decision making processes. To find out more, refer to the 'Your personal data rights explained' section of this booklet.

Consequences of processing

If we (or a fraud prevention agency) determine that you pose a fraud or money laundering risk, we may refuse to provide the financial services or financing you've requested, 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.

Data transfers

Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

For more information about the fraud prevention agencies that we use, and how they will process your personal data, please contact:

The Compliance Officer

Cifas

6th Floor, Lynton House 7-12 Tavistock Square London

WC1H9LT

Website: cifas.org.uk/fpn

The Compliance Officer

National Hunter

PO Box 2756 Stoke on Trent Staffordshire ST6 940

Website: nhunter.co.uk/howitworks/

The Compliance Officer

National SIRA

Synetics Solutions Limited Synetics House The Brampton Newcastle under Lyme

ST5 OQY

Website: synectics-solutions.com

3. Credit reference agencies explained

The identities of the credit reference agencies, and the ways in which they use and share personal information is explained in more detail in the Credit Reference Agency Information Notice (CRAIN) document, which can be accessed via any of the following links:

- (i) experian.co.uk/crain
- (ii) equifax.co.uk/crain
- (iii) transunion.co.uk/crain

4. Your personal data rights explained

Your personal data is protected under Data Protection legislation, and as a consequence you have a number of rights that you can enforce against us as your Data Controller. As email is not secure, we do not advise you to communicate any personal data with us in this way. If you do make a request to us via email, we will need to take you through appropriate security over the phone, before your request can be accepted and processed.

Right to rectification

This right refers to having your personal data corrected if it's inaccurate, or to have any incomplete personal data completed.

Right to object to processing

In certain circumstances you can object to the processing of your personal information.

To object to the processing of your personal information for marketing or market research, please refer to the 'Marketing and market research opt-out' section of this booklet.

If you object to the processing of your personal data for any other reason, it may mean we can't provide certain products and services to you.

Right to restrict processing

You can ask us to restrict processing your data, for example where:

- o you're contesting the accuracy of your personal data;
- we no longer need to process your personal data, but you want us to keep it for use in legal claims; or
- you've objected to the processing by asking us to stop using your data, but you're waiting for us to tell you if we have overriding grounds which mean we're allowed to keep on using it.

If the right applies, this means with the exception of storage, your personal data can only be processed by us with your consent or for certain things such as legal claims or to exercise legal rights.

If you request that we restrict the processing of your personal data it may mean we can't provide certain products and services to you.

Right to erasure (Right to be forgotten)

In the circumstances below you can ask us to delete your personal data. Where the right doesn't apply we'll let you know why we can't action your request.

This right may be applied where:

- personal data is no longer necessary in relation to the purpose for which it was originally collected/processed;
- the processing was based on your consent which you withdraw (and there are no other legal grounds for processing that data);
- o you exercise your right to object and there are no overriding legitimate grounds for the processing; or
- there is no lawful reason to retain personal data or if the personal data has to be erased to comply with a legal obligation.

Right to portability

You can ask us to provide you with a copy of certain personal data in a structured, commonly used, machine-readable format. This right only applies to personal data that you've previously provided to us, we process electronically and we're processing based on your consent or to perform a contract with you. Your account must also be open in order to exercise this right.

If you request a right to portability on your joint account, you'll only receive your own personal and transactional data and only if you have transactional access on the account. Other joint account customers on the same account will need to make a separate request.

To request a right to rectification, to object or to restrict processing, to erasure or to portability you can contact us:



By phone

Call us on **0800 092 3300**.

Calls may be recorded or monitored.



By post

Write to us at the address below - providing your name, address and account number and in case we need to talk to you, your phone number and a convenient time for us to discuss your request.

Cater Allen Private Bank FREEPOST ANG 40024 Bradford BD1 5WL (no stamp required)

Marketing and market research opt-out

If you'd prefer not to receive up-to-date information on our products and services, or to be included in market research, you can indicate this by updating your marketing preferences at any time.

To opt-out of marketing and market research you can contact us:



By post

Write to us at the address below - providing your name, address and account number and in case we need to talk to you, your phone number and a convenient time for us to discuss your request.

Cater Allen Private Bank FREEPOST ANG 40024 Bradford BD1 5WL (no stamp required)



By phone

Call us on **0800 092 3300**.

Calls may be recorded or monitored.

Text or email opt-out

If you receive marketing emails and don't want to in future, please use the unsubscribe link within the email and we'll remove you from all future campaigns.

Sharing of your personal data

If you open an account with us, your information will be kept after your account is closed. Your information may be shared across the Santander Group or associated companies, service providers or agents for administration purposes to:

- o provide and run the account or service you have applied for, and develop and/or improve our products and services;
- identify and advise you by post, telephone or electronic media (including email and SMS) of products or services which our group of companies and our associated companies think may be of interest to you (for credit products this may involve releasing your details to a credit reference agency); and
- release your name, address and telephone number to market research organisations for the purpose of confidential market research surveys, carried out by post or telephone, on our behalf.

Complaints

We always strive to provide you with the best account(s). Unfortunately things can sometimes go wrong, but telling us about errors or oversights will give us the chance to fix things for you and make long-term improvements to our services.

Contact us:



By phone

Call us free from a UK landline on **0800 092 3300**. Please have your Personal Access Code (PAC) to hand when calling. If you don't have a PAC or have lost or forgotten it, please contact us on the number above.

Calls may be recorded or monitored.



By post

Write to us at the address below, providing as much detail as possible about what's gone wrong, along with your name, address, account number, phone number and a convenient time for us to call you to discuss your complaint.

Complaints

Client Team Cater Allen Private Bank FREEPOST ANG 40024 Bradford BD1 5WL

Our Complaints Leaflet is available upon request and contains further information on our complaints process, including the handling timescales. This information is also available on our website at **caterallen.co.uk**.

You may also be able to refer your complaint to the Financial Ombudsman Service. The Financial Ombudsman Service acts as an independent and impartial organisation which helps settle disputes between consumers and financial services businesses. You can find out more information at **financial-ombudsman.org.uk**.

Data subject access requests

You have the right to find out what information, if any, is held about you. This is known as a data subject access request.

A data subject access request is not designed to deal with general queries that you may have about your account. We therefore aim to provide you with the information you require without you having to make a formal request. If you would like to find out specific information about your account, you can contact us by phone or by writing to us.

To make a formal data subject access request you can contact us:



By phone

Call us on **0800 092 3300.**

Calls may be recorded or monitored.



By post

Write to us at the address below, providing:

- o a daytime phone number in case we need to contact you to discuss your request;
- o your sort code and account number(s); and
- o detail on what information you are requesting.

Subject Access Requests

Client Team Cater Allen Private Bank FREEPOST ANG40024 Bradford BD1 5WL

Automated decision making and processing

In some instances we'll undertake automated processing and decision-making to decide which of our other account(s) might be of interest to you. You have a right not to have a decision made based solely on automated processing (including profiling) that produces legal or similar effects. This doesn't apply where the processing is necessary for the performance of a contract, is authorised by law, or the person has given their consent to the processing (though they can revoke their consent thereafter).

Where you have been adversely affected by an automated decision, and/or you think we have made a mistake, or you have further information to support your case, there is an underwriting process in place. We can't guarantee to reverse a decision, but we'll always be happy to reconsider your application if you believe you have been wrongly declined.

To ask us to reconsider your application you can contact us:



By post

Write to us at the relevant address below, providing your name, address, phone number and a convenient time for us to call you to discuss your request.

The Appeals Officer

Cater Allen Private Bank 9 Nelson Street Bradford BD1 5AN

Glossary of terms

Behavioural scoring

Techniques that help organisations decide whether or not to grant credit to customers.

Beneficiary bank

A beneficiary bank is the receiving bank where you have your account.

Binding Corporate Rules

Personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or a group of enterprises engaged in a joint economic activity.

Biometric data

Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of an individual, which allows or confirms the unique identification of that individual, such as facial images or things like fingerprints.

CHAPS

Clearing House Automated Payment System.

Data Controller

The natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Data Protection Officer

A person charged with advising the controller or processor on compliance with data protection legislation and assisting them to monitor such compliance.

Disassociation

A disassociation is a method of removing a financial connection between individuals that have been connected together as financial associates at the credit reference agencies. When people have joint accounts or they live together where their earning and spending behaviour affects each other, information on these financial relationships is taken into account when individuals apply for credit. Credit reference agencies hold this information as 'financial associations'. If an individual has been incorrectly linked to someone else or all financial ties have been broken so there are no longer any shared finances such as income or spending, then an individual can request for a 'disassociation' at the credit reference agencies.

FFΔ

The European Economic Area (EEA) is the area in which the Agreement on the EEA provides for the free movement of persons, goods, services and capital within the European Single Market, including the freedom to choose residence in any country within this area. The EEA includes the EU countries as well as Iceland, Liechtenstein and Norway.

Legal basis

The legal basis for processing personal data.

Legitimate interest

The lawful grounds for data processing. Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Personal data

'Personal data' means any information relating to an identified or identifiable natural person ('Data Subject'). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Special categories of personal data

The special categories of personal data are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data or data concerning an individual's sex life or sexual orientation, and the processing of genetic data or biometric data for the purpose of uniquely identifying an individual.

Cater Allen Private Bank is able to provide literature in alternative formats. The formats available are: Large Print, Braille and Audio CD. If you would like to register to receive correspondence in an alternative format please contact us on 0800 092 3300. For the hard of hearing and/or speech impaired please use the Text Relay service. Further details can be found at http://ngts.org.uk/