



## Data Protection Statement

### Introduction

This data protection statement sets out how you'll use my personal data. My personal data is data which by itself or with other data available to you can be used to identify me. You are Cater Allen Private Bank, the data controller. I can contact your Data Protection Officer (DPO) at 201 Grafton Gate East, Milton Keynes, MK9 1AN if I have any questions.

Where there are two or more people named on this form, this data protection statement applies to each person separately.

### The types of personal data you collect and use about me

You will use my information to manage my Bereavement Notification. The personal data you use may include:

- Full name and personal details including contact information (e.g. home address, email address, home and mobile telephone numbers);
- Date of birth and/or age;
- Family, lifestyle or social circumstances if relevant (e.g. relationship to the deceased); and
- Information on other people named on the account. I understand I must have their authority to provide their information to you and I must share this data protection statement with them and details of what I've agreed on their behalf.

You may record calls, email, text messages and social media messages or other communications in relation to my dealings with you as permitted legally.

### Using my personal data: the legal basis and purposes

Information about me is required to process my bereavement notification, in order to carry out the **contractual requirements** between the deceased person and Santander. This includes updating your records, tracing my whereabouts to contact me about the deceased accounts. You may sometimes need to disclose my personal data because of a **legal or regulatory responsibility**, or where you have my consent. If I give you my consent I understand that I'm free at any time to change my mind. You'll tell me if providing some personal data is optional, including if you ask for my **consent** to process it. In all other cases I must provide my personal data so you can process my notification. You will not collect any personal data from me that you do not need in order to process my notification.

Where I request that ownership of an investment account(s) is transferred, before the transfer can take place the new owner(s) will need to complete a separate application form that will include a Data Protection Statement (which sets out how their personal data may be used).

Where I request the closure of Santander accounts you will carry out checks to ensure that I am entitled to close the account(s). This will include:

- Checking and sharing information from fraud prevention agencies, to verify my identity and make fraud prevention and anti-money laundering checks as necessary;
- To comply with legal and regulatory requirements and related disclosures;
- For the establishment and defence of legal rights;
- For activities relating to the prevention, and for the detection and investigation of crime.

This processing is necessary to comply with your **legal obligations**.

You will also process my personal data for your own **legitimate interests** or those of other persons and organisations. You will do this for the purposes of:

- Good governance, accounting, and managing and auditing your business operations; and
- To monitor emails, calls, other communications, and activities relating to my dealings with you.

### Sharing and using my personal information

Subject to applicable data protection law you may share my personal data with:

- The Santander group of companies\*, your associated companies in which you have shareholdings, and with sub-contractors and other companies or persons acting on your behalf;

- Your legal and other professional advisors, including your auditors;
- Fraud prevention agencies, credit reference agencies, and debt collection agencies where necessary when you register me as a legal representative and/or owner and as part of the account transfer of ownership process and ongoing account or service management;
- Other organisations via shared databases;
- Government bodies, regulators, agencies and courts in the UK and overseas to comply with legal requirements, and for the administration of justice (including disclosing my personal information to tax authorities in other countries, or with HMRC who may share the information with the other tax authorities if you believe that I may have tax obligations in another country);
- Other parties connected with the deceased account, for example guarantors; or if the deceased had a joint account, sharing information in such circumstances with other people named on the application may be necessary (for example transactions made by me will be seen by the other account holder);
- Market research organisations to assist you in improving your products or services; and
- Anyone else where you have my consent or as required by law.

### Identity verification and fraud prevention checks

The personal data you've collected from me will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify my identity. If fraud is detected, I could be refused certain services, finance or employment in future. You may also search and use your internal records for these purposes. Further details on how my personal data will be used by you and these fraud prevention agencies, and my data protection rights, can be found in the 'Using My Personal Data' booklet.

### International transfers

My personal data may be transferred outside the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection. Further details can be found in the 'Using My Personal Data' booklet.

### Criteria used to determine retention periods

The following criteria are used to determine data retention periods for my personal data:

- **Retention in case of queries.** You'll retain my personal data as long as necessary to deal with my queries;
- **Retention in case of claims.** You'll retain my personal data for as long as I might legally bring claims against you; and
- **Retention in accordance with legal and regulatory requirements.** You'll retain my personal data after my account, policy or service has been closed or has otherwise come to an end based on your legal and regulatory requirements.

### My rights under applicable data protection law

My rights are as follows (noting that these rights don't apply in all circumstances and that data portability is only relevant from May 2018):

- The **right to be informed** about your processing of my personal data;
- The right to have my personal data **corrected if it's inaccurate** and to have **incomplete personal data completed**;
- The right **to object** to processing of my personal data;
- The right **to restrict processing** of my personal data;
- The right **to have my personal data erased** (the "right to be forgotten");
- The right **to request access** to my personal data and information about how you process it;
- The right **to move, copy or transfer my personal data** ("data portability"); and
- Rights in relation to **automated decision making** including profiling.

## Data Protection Statement (continued)

I have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: [ico.org.uk](http://ico.org.uk).

For more details on all the above I can contact your DPO or request the 'Using My Personal Data' booklet by calling 0800 092 3330 or I can view it online at [caterallen.co.uk](http://caterallen.co.uk).

### Data anonymisation and aggregation

My personal data may be converted into statistical or aggregated data which can't be used to identify me, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

### \*Group companies

For more information on the Santander group companies, please see the 'Using My Personal Data' booklet.

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/>

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