



Protecting your
Privacy



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Protecting your privacy

“We”, “our” or “us” means Close Brothers Limited and its subsidiaries, affiliates and their respective parent and subsidiary companies (“Close Brothers Group”). For the purposes of data protection law, we are a data controller in respect of your personal data. We collect and use your personal data and where applicable this may include information related to your spouse/partner, directors, partners and owners (your “representatives”). Close Brothers is responsible for ensuring that it uses your personal data in compliance with data protection law.

If you have any questions about this notice, about how we process personal data or about your rights over your personal data, our Data Protection Officer can be contacted at dpo@closebrothers.com or DPO, Close Brothers, 10 Crown Place, London EC2A 4FT.

This notice applies to any personal data we receive from you, create or obtain from other sources and explains how it will be used by us. It is important that you take the time to read and understand this notice so that you understand how we will use your personal data and your rights in relation to your personal data.

Personal data that we collect about you

We will collect and use the following personal data about you and your representatives:

Information you give us

- This is information about you and your representatives that you give us by filling in forms or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your and your representatives' name, address, e-mail address and phone number, financial and credit card information, employment history and identification records.
- You must ensure that in respect of any information you provide us with, which does not relate to you (for example, information about your representatives), you have obtained the necessary consent in order to disclose such information and provided the individual to whom the information relates with a copy of this notice.

Information we collect or generate about you and your representatives

- **Website Usage Information** – our website uses analytics services such as Google Analytics to automatically gather certain statistical information such as the number and frequency of visitors and their IP addresses. This information is used as aggregated statistical information about users, providing usage by IP address. We do not identify individual users from this type of data. This information helps us to measure how individuals use the website and our services, so that we can continually improve them.
- **Online Behaviour Indicators** – Our website uses a third party service that processes certain information including your IP address, geo location data, specific URL and Close Brothers web pages visited, for purposes of security and fraud prevention.
- We sometimes record telephone conversations to resolve complaints, improve our service and for training and quality assurance purposes.
- We generate data for statistical analysis.

Use of cookies

For full details on what cookies are, what they do, and which cookies are used by us, please see our Cookie Policy (www.closesavings.co.uk/cookies).

To enable you to sign in and personalise your online experience we use “cookies”. A cookie is a small text file that is placed on your hard disk by a web page server. Cookies contain information that can later be read by a web server in the domain that issued the cookie to you. Cookies cannot be used to run programs or deliver viruses to your computer. We use cookies to store your preferences and other information on your computer in order to save you time by eliminating the need to repeatedly enter the same information and to display your personalised content and appropriate advertising on your later visits to our website.

Information we receive from other sources

Fraud prevention agencies

When verifying your identity as part of our application process, we may access information recorded by fraud prevention agencies within and outside the UK. This may include information about any criminal convictions and any allegations regarding criminal activity that relate to you.

Intermediaries

We may receive information from dealers, brokers and introducers including your personal details, contact details and relevant details for the purposes of entering into and administering your agreement.

Social media profile

Where you have clicked through one of our promotions or event notices posted on a third party social media website such as LinkedIn, we will receive your contact information provided as part of your user profile such as your name, email address and telephone number and any other relevant business information such as your organisation's name, address and your industry. Some of this information may be prepopulated based on your social media profile; other parts may be completed by you, as and when requested.

Public databases

We may obtain information about individuals from public databases. We use reputable sources including but not limited to the electoral register and Companies House. We employ appropriate measures to assure the quality of information which we collect.

How we use your personal data

Your personal data may be used by us in the following ways:

Fraud prevention

- We may use fraud prevention agencies such as Equifax and FinScan to verify your identity as part of the account opening process for new customers;
- you can find further information about how agencies such as Equifax may process your personal data at <https://www.equifax.co.uk/crain.html> or you can contact us to obtain a paper copy of this information;
- we may use automated decision making systems to either fully or partially assess your information. The results of this decision may decide whether we provide you with our services or not. If you disagree with the results of an automated decision, you can request a review of your application;
- to allow us to detect and prevent fraudulent activity including sharing personal data with fraud prevention agencies; and
- to allow us to detect and prevent money laundering activity.

Products & services

- To provide you with information, products or services that you may request from us;
- to carry out our obligations arising from any agreements you enter into with us;
- to make payments;
- to recover monies;
- where we are permitted to do so, to send promotional information about our products and services via the methods you specify (i.e. email, post, etc.); and
- to contact you via post, email or telephone in relation to the administration of your account or to carry out quality control research.

Statistical analysis

- As part of our legal and regulatory obligations, we conduct statistical analysis in order to improve our credit risk profile, tackle fraud, and improve our credit decisions. This may include statistical analysis on your personal data even if your application is declined by us or you decide not to complete your application with us; and
- in order to identify and offer you tailored products and services that are suitable for you and improve our service.

Legal basis for processing your personal data

We process your personal data pursuant to the following legal bases:

- Taking steps (at your request) prior to entering into an agreement with you, and subsequently for the administration and performance of our agreement with you;
- to comply with our legal and regulatory obligations;
- to establish, exercise or defend our legal rights and / or for the purpose of (or in connection with) legal proceedings;
- the use of your personal data as described is necessary for our legitimate business interests which are:
 - enforcing the terms and conditions of any agreement we have with you;
 - the recovery of outstanding debts existing under an agreement with you;
 - for statistical analysis to improve our products and services;
 - to ensure the safety and security of our systems and service for all users; or
 - to contact you about products and services that may be of interest to you.
- You may object to this at any time by contacting us at savings@closebrothers.com or by calling 020 3857 3050 or by mail addressed to Close Brothers Limited, 4th Floor, 10 Crown Place, London, EC2A 4FT.

Sharing your personal data

We may disclose your personal data within the Close Brothers Group and to third party service providers in the circumstances described below:

- To ensure the delivery or maintenance of products or services you have taken out with us;
- to ensure the safety and security of our data; and
- as part of our internal research and statistical analysis activity.

We will take steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of the Close Brothers Group:

- In order to enforce or apply the terms of use and other agreements you have with us;
- claims handling and fraud prevention;
- any funder in order to enable funders to assess the value of our assets;
- any broker or introducer of an agreement with us;
- tracing and repossession agents;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer; and
- to third party agents or contractors (for example, the providers of our electronic data storage services or call centres) for the purposes of providing services to us.

These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.

We may also share your personal data outside of the Close Brothers Group to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation including but not limited to disclosures made to:

- Fraud prevention agencies
- Companies House

and to establish, exercise or defend our legal rights.

Transfer of personal data outside the European Economic Area / UK

The information you provide to us will be transferred to and stored on our secure servers in the European Economic Area (“EEA”) or in the UK (in the event that the UK is not a member of the EEA). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA and/or in the UK. It may also be processed by staff operating outside of the EEA and/or in the UK who work for a company in the Close Brothers Group or for one of our suppliers.

Where we transfer your personal data outside the EEA and/or in the UK, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA and/or in the UK. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission or a relevant data protection authority;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission or a relevant data protection authority, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA and/or in the UK. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA and/or in the UK (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contact us” section below.

How long we keep your personal data

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to store your personal data.

If you are a customer we will retain your personal data for 7 years following the end of our relationship with you, unless we are required by law to keep it for a longer period of time (in which case, we will keep it until the expiry of the period required by law).

Your rights

You have a number of rights in relation to the personal data that we hold about you. These rights include:

- The right to object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but may be legally entitled to refuse that request;
- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
- the right to object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request;
- the right to object to any automated decision making (including profiling) which we conduct based on your personal data, which significantly affects you. Please note that there may be circumstances where you object to us conducting automated decision making but we are legally entitled to refuse that request;
- the right to object to the processing of your personal data for direct marketing purposes; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us is easy” section on page 12.

You can find out more information about your rights by contacting the data protection regulator, the Information Commissioner, or by searching their website at <https://ico.org.uk/>.

Changes to our privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be posted on our website (www.closesavings.co.uk/privacy) and, where appropriate, notified to you by your preferred method of contact. Please check back frequently to see any updates or changes to our privacy policy.

Contacting us is easy

We are registered in the UK and our registered address is at 10 Crown Place, London, EC2A 4FT and our company registration number is 195626.

Please contact us if you have any questions about our privacy policy or personal data we hold about you.

✉ **Write:** Close Brothers Limited, 4th Floor, 10 Crown Place, London, EC2A 4FT

☎ **Call:** 020 3857 3050 (opening hours: Monday to Friday, 9am – 5pm)

🖱 **Email:** savings@closebrothers.com