

# HOW WE USE PERSONAL INFORMATION

### INFORMATION ABOUT US:

**We, us and our** means Family Building Society (a trading name of National Counties Building Society) and National Counties Building Society (NCBS), the “Group”.

The data controller is NCBS of Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL.

Our Data Protection Officer can be contacted at any time by writing to the above address, including if you have queries about this privacy policy or wish to exercise any of the rights mentioned in it.

### WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

We will generally collect your personal information from you directly or from a third party authorised to act on your behalf, such as a packager. This includes:

- Your title, full name, your contact details, including for instance your email address and mobile telephone number;
- Your business address and correspondence address (where this is different from your business address);
- Information about whether you are directly authorised by the Financial Conduct Authority or, if not, the name of your principal;
- Whether you are a member of a mortgage club or network; and
- Details of your bank account (where procurement fees are to be paid directly to you).

Where you provide personal and financial information relating to others (e.g. partners or directors or prospective customers), you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it for the purposes set out below or, in the case of prospective customers, for the purpose of assessing and underwriting the mortgage application.

### HOW WE USE YOUR PERSONAL DATA

We and other companies in the Group will use your information on the following legal grounds. For some processing more than one legal ground may be relevant (except where we rely on consent):

1. Processing necessary **to perform our agreement with you:**
  - a) administering and managing your relationship with us, and updating our records.
2. Processing necessary **for the following legitimate interests** where we consider, on balance, it is appropriate for us to do so:
  - a) administering and managing your relationship with us, and updating our records;
  - b) to test the performance of our services and internal processes;
  - c) to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner’s Office;
  - d) for management and audit of our business including accounting;
  - e) to carry out monitoring and to keep records (see below);
  - f) to administer our good governance requirements and those of other member of our Group such as internal reporting and compliance obligations;
  - g) to help develop and improve the services provided to you and your clients;
  - h) for market research and analysis, and developing statistics;
  - i) to provide you with details of our products and services and important updates to these products and services;

- j) for some of our profiling. We explain more about our profiling activities below; and
- k) when we share your personal information with these other people or organisations:
  - our legal and other professional advisers and auditors;
  - governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner's Office;
  - other organisations and businesses who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
  - market research and other organisations who help us to develop and improve our products and services.

**3. Processing necessary to comply with our legal obligations:**

- a) for compliance with laws that apply to us;
- b) for establishment, defence and enforcement of our legal rights or those of any other member of our Group;
- c) for activities relating to the prevention, detection and investigation of crime;
- d) to carry out monitoring and to keep records (see below);
- e) to deal with requests from you to exercise your rights under data protection laws;
- f) to process information about a crime or offence and any related proceedings (in practice this will be relevant if we know or suspect fraud); and
- g) when we share your personal information with these other people or organisations:

- law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner's Office; and
- courts and other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

**4. Processing with your consent:**

- a) when you request that we share your personal information with someone else and consent to that.

For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details on the back page.

## IS YOUR PERSONAL INFORMATION TRANSFERRED OUTSIDE THE UK OR THE EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area (EEA). If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us. Safeguards include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the EEA. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where

the framework is the means of protection for the personal information.

For more information about suitable safeguards and (as relevant) how to obtain a copy of them or to find out where they have been made available you can contact us using the details on the back page.

### DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

We are unable to accept mortgage applications submitted by you on behalf of your clients without having personal information about you. Your personal information is required before we can enter into the intermediary agreement with you.

In cases where providing some personal information is optional, we will make this clear. For instance, we will say in application forms or on our website if alternative telephone contact numbers can be left blank.

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. You can do this by contacting us using the details on the back page. Once we have received notification that you have withdrawn your consent, we will no longer process your information for that specific purpose or purposes, unless we have another legitimate basis for doing so in law, in which case we will let you know.

### DO WE DO ANY MONITORING INVOLVING PROCESSING OF YOUR PERSONAL INFORMATION?

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone calls we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, and to have a record of what we have discussed with you and actions agreed with you.

Both telephone call recording and monitoring may be conducted for quality control and staff training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct short term carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with our legal obligations, for instance, where we suspect fraud, money laundering or other crimes.

### PROFILING

This section is relevant where we make decisions about you using only technology, and where none of our employees or any other individuals have been involved in the decision making process. We may do this:

- to decide what marketing communications are suitable for you;
- to decide which products and/or services we provide to you and your clients; and
- to analyse statistics.

We can do this activity based on our legitimate interests only where the profiling does not have a legal or other significant effect on you.

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## FOR HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

We will keep your personal information for as long as you continue to submit mortgage applications to us.

After you stop submitting mortgage applications to us, we will keep your data for 25 years after our relationship with any customer you introduce to us has ended for one of these reasons:

- To respond to any questions or complaints;
- To maintain records according to rules that apply to us.

We may keep your data for longer than set out above if we cannot delete it for legal, regulatory or technical reasons. If we do, we will make sure your privacy is protected and only use it for those purposes.

## WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LAWS?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they apply or not.

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to restrict processing of your personal information;
- The right to have your personal information erased (the 'right to be forgotten');
- The right to request access to your personal information and to obtain information about how we process it;

- The right to move, copy or transfer your personal information ('data portability');
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.

You also have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>

You can contact our Data Protection Officer or read our leaflet "Your Data Protection Rights" for more details on all the above, available at [familybuildingsociety.co.uk/rights](http://familybuildingsociety.co.uk/rights)

## YOUR MARKETING PREFERENCES AND WHAT THIS MEANS

We may use your business and correspondence address, phone numbers, email address and social media (e.g. Facebook, Google and message facilities in other platforms) to contact you according to your marketing preferences. This means we do this only if we have a legal ground which allows it under data protection laws – see above for what is our legal ground for marketing. You can stop our marketing at any time by writing to us or by following the instructions on how to do that in the marketing email or other communication.

## WHO IS IN OUR GROUP

As at the date of this privacy notice, the members of our Group are:

- Family Building Society (a trading name of National Counties Building Society)
- National Counties Building Society
- Counties Home Loan Management Limited

You should check our website at [familybuildingsociety.co.uk](http://familybuildingsociety.co.uk) from time to time in case of any changes to our Group.



Family Building Society is a trading name of National Counties Building Society which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority and is a member of the Building Societies Association.

**Principal Office:** Ebbisham House, 30 Church Street, Epsom, Surrey KT17 4NL.

**Telephone:** 01372 744155

**Email:** [mortgage.desk@familybsoc.co.uk](mailto:mortgage.desk@familybsoc.co.uk)



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