



Charter Savings Bank **Privacy Notice**

2018 Edition

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1. About us

Charter Savings Bank is a trading name of Charter Court Financial Services Limited which is part of the Charter Court Group. The Charter Court Group is made up of Charter Court Financial Services Group plc and its subsidiary companies Charter Court Financial Services Limited, Charter Mortgages Limited, Exact Mortgage Experts Limited and Broadlands Finance Limited. Charter Court Financial Services Limited also trades under the name of Precise Mortgages.

Charter Court Financial Services Limited will be a data controller of any personal data it holds about you and the account(s) you have with us. We may share this information with other parts of the Charter Court Group. Where this occurs, they will be a separate data controller in respect of that personal data, and this privacy notice will also apply to the processing they undertake, unless they provide you with an alternative privacy notice.

A data controller is an individual or organisation which decides how your personal data will be used. The data controller is referred to as "we", "us" and "our" in this privacy notice.

If you require any further information, or wish to contact us or our Data Protection Officer at any time, our contact details are:

Address: Charter Savings Bank
PO Box 855
Wallsend
NE28 5BL

Telephone Number: 0800 032 9999

DPO Email: thedataprotectionofficer@chartercourtfsc.co.uk

Customer Services: info@online.chartersavingsbank.co.uk

2. Who this privacy notice applies to

This privacy notice explains how we will use the personal data of:

- anyone who applies for, or has a savings account with us;
- anyone who becomes, or applies to be added as a party to an existing savings account, and
- representatives of anyone who has a savings account with us including persons appointed under a Power of Attorney and personal representatives.

Each such person is referred to as "you" and "your" in this privacy notice.

3. Why we are providing you with this privacy notice

Applicable Data Protection laws (including the General Data Protection Regulation 2016 and the Data Protection Act 2018), impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use or erase) your personal data fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you, we will inform you of any changes before they take effect.

4. How we obtain your personal data

We will mainly receive personal data about you from you, but we will also receive it from other sources including from other applicants or account holders, persons who represent or advise you including a person appointed under a Power of Attorney, your bank or building society, fraud prevention agencies, the Cash ISA Transfer Service, persons working on our behalf and providing us services, market researchers, government, tax and law enforcement agencies and other companies within the Charter Court Group.

We will also receive and create personal data about you during the course of the application for, and our administration of, a savings account, for example from emails, telephone calls, letters and other documents. We may also obtain data about you that is publicly available, such as from the Electoral Register and the Internet.

5. The types of personal data we will have about you

5.1 Personal data

We may process a wide variety of data about you, where necessary, for the purposes set out in the "How We Will Use Your Data" section, including data about:

you as an individual	<ul style="list-style-type: none"> • name, title and address (including previous names and addresses) • other contact details including email addresses and telephone numbers • gender and date of birth • mother's maiden name • nationality • countries of which you are a citizen or resident in • National Insurance Number • Tax Identification Numbers • employment and employment history
people connected to you	<ul style="list-style-type: none"> • your family • your advisers and representatives, including persons appointed under a Power of Attorney and personal representatives
your financial details	<ul style="list-style-type: none"> • your bank account details (name of bank, account holders, account number and sort code), including previous bank account details • the details of bank accounts from which, or to which, payments are sent • details of savings accounts you have with other banks and building societies (e.g. ISAs) including the name of the provider, account/reference number, sort code and balances • details of investments held within a stocks and shares ISA (description of investment, investment indicator, number and value)
other information identifying you	<ul style="list-style-type: none"> • password • memorable date • memorable name • memorable place
your accounts, products and services you have with us	<ul style="list-style-type: none"> • your account number(s) • account terms, balances, payments to and from your savings account • your use of our online banking service
your preferences	<ul style="list-style-type: none"> • whether you wish to receive marketing from us, or prefer documents in large print or other alternative formats
your technology	<ul style="list-style-type: none"> • device identifiers including IP address
your profile and how you use our products and services	<ul style="list-style-type: none"> • details of your products and services with us, including how you access and use those services • how we have grouped you with other types of customers
your correspondence and documents we hold	<ul style="list-style-type: none"> • documents we hold (e.g. Driving Licence, Passport, Birth Certificate), correspondence or communications received or sent and the information contained within them

5. The types of personal data we will have about you (continued)

5.2 Special category data

Some personal data, for example data about your health, racial or ethnic origin, is subject to additional rights and are described as special category data. We will not normally ask for or record this special category data, but we may ask for and record details about your health if it is necessary and relevant for the management of the account (e.g. so we can make reasonable adjustments to assist you in accessing and managing your account(s), which may include sending you information in braille or large print; if we think you are experiencing circumstances which may lead you to being financially or otherwise vulnerable, or you request that we waive the terms and conditions of your account due to exceptional circumstances).

We will only do this if you have confirmed your consent to us doing so, or where we are legally permitted or required to process this information without seeking your consent. You are not contractually required to provide this information, and where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so, but that may affect our ability to manage your account in the most appropriate way for you. If you withdraw your consent, we will not continue to process this information for those purposes, but it will not impact the validity of any processing undertaken before you withdrew your consent.

6. How we will use your data

We will use your personal data to:

<p>consider your application for a savings account, to administer and provide the savings account and other products and services you have or apply for with us</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • check your identity, address and other information provided to us about you • manage our relationship with you • make and receive payments and to ensure payments received and sent are allocated to the correct account and beneficiary • manage fees, charges and interest due or payable • locate you if we reasonably believe you are no longer living at the most recent address we have for you • link the savings account to other products and services you have with us • create records, produce correspondence and other documents, and to provide information to you and other persons • identify circumstances which may make you vulnerable so that we can take account of this in our dealings with you • update, consolidate and improve the accuracy of our records • monitor and analyse the use of your account with us • identify other products and services you may be interested in and to tell you about other products and services • consider any future applications you make • tell you about products and services offered by us and those of third parties which we think may be of interest to you (further information on this is provided below)
<p>identify and prevent financial crime</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • to detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime
<p>comply with our legal, contractual and regulatory obligations, codes of practice and to run our business</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • share data about you and your accounts with us with: <ul style="list-style-type: none"> • our regulators, the Bank of England, the Financial Services Compensation Scheme and ratings agencies; • our investors or potential investors, funders and their advisers; • any prospective purchaser of us or any part of our business, seller to us or party seeking to merge with us or any person who does or wishes to fund, or otherwise be involved in any such transaction and their representatives, or • fraud prevention agencies who in turn will provide data to us (further information on this is provided below) • identify if you, a close associate or relative are subject to financial sanctions, or are considered Politically Exposed • provide data, reports and returns to our regulators, HMRC, UK and overseas tax authorities, Reclaim Fund Ltd, statutory or trade bodies • provide data when required by a court order or other legal or contractual obligation • manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing • manage our savings accounts and use our resources • manage risk for us and our customers • seek advice from our advisers

6. How we will use your data (continued)

We will use your personal data to:

develop and improve our products and services	<p>this will include to:</p> <ul style="list-style-type: none"> • test products and services • obtain your feedback on the products and services we provide • undertake market research • ensure that we meet high standards of customer service, including monitoring calls and training staff
undertake analysis, produce models, statistics, reports and forecasts	<p>this will include to:</p> <ul style="list-style-type: none"> • predict future behaviour • analyse and model the future performance and behaviour of you and other existing or future savers with us
to investigate and respond to complaints, disputes and where necessary to bring or defend legal claims	<p>this will include to:</p> <ul style="list-style-type: none"> • identify and document facts and evidence • investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims • allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services

7. How we use your personal data to make automated decisions

Sometimes we will make an automated decision. These help to ensure that our decisions are quick, fair and efficient based on the personal data we have about you. The types of automated decisions we make are:

- to check whether you meet the conditions required to open the account you have applied for;
- to check your identity, or
- to decide whether we will offer additional products and services, or the opportunity to vary existing products or services and the terms of any such products, services or variation.

These automated decisions may also take into account details of any products you already have with members of the Charter Court Group.

You can ask us not to make automated decisions about you by contacting our Data Protection Officer, or ask us to review any automated decision that we have made taking into account any additional information you wish to provide to us.

8. Call recording

We may record and/or monitor telephone calls with you for the following purposes:

- for security, quality and/or training purposes;
- to confirm that we have complied with your instructions;
- to resolve or investigate any queries;
- to comply with our legal obligations, or
- to prevent fraud or other criminal activities.

9. Marketing

We will ask you, when you provide us with your personal data, if you are happy for us to contact you by telephone, post, email or SMS about products and services offered by us and those of third parties which we think may be of interest to you. If you do not agree to this, we will not use your personal data for these purposes.

If, at any time, you change your preferences and either do wish to receive such communications or wish us to stop sending you such communications you can let us know by one of the following methods:

If you have an Online Account

- log in to your account at www.chartersavingsbank.co.uk
- click on 'Change details', and
- click on 'Change communication preferences' under the heading 'Change Personal Details'.

or

- log in to your account and send us a secure message

or

If you have an Online or Postal Account

- email us at info@online.chartersavingsbank.co.uk and we'll be happy to contact you to help change your preferences. (As this isn't a secure channel, please don't include any personal details in any emails sent to this address.)

or

- write to us at the address shown on page 3.

10. The legal grounds on which we will process your data

We will only process your personal data if we have a reason to do so that is legally permitted. When using your personal data for the purposes listed above, we are relying on one or more of the following legal reasons for processing that data:

- the purpose is necessary for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you;
- the purpose is necessary for us to comply with our legal obligations;
- the purpose is necessary for our legitimate interests, or
- if you have consented to us processing personal data for one or more specified purposes.

The legitimate interests we have for processing your personal data as described above include to:

- comply with our legal and contractual obligations, best practice and codes of practice;
- exercise our legal rights;
- prevent financial and other crime;
- enhance and develop the product and services we provide to you;
- develop and improve our business, products and services and the terms which apply to them;
- undertake analysis, modelling and forecasting;
- manage and mitigate the risks to you and our business;
- keep our records up to date and to enable us to link your different accounts with us together;
- verify the information provided to us to ensure its accuracy;
- be efficient in running our business, providing our products and services, and meeting expectations of us;
- contact existing customers about other products and services we offer;
- ensure our business is profitable, has adequate levels of capital and funding, or
- facilitate investment in, and the growth of, our business.

Any special category data will only be processed where it is necessary and only:

- with your prior explicit consent;
- where permitted by law to protect your well-being, or
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

11. Who we share your data with

We share your personal data with other companies within the Charter Court Group and with:

- you, your representatives and advisers including persons appointed under a Power of Attorney and personal representatives;
- parties to the savings account;
- any person you ask us to provide information to;
- our clearing bank;
- your bank or building society;
- banks and building societies from which payments are sent or received;
- your trustee in bankruptcy or the supervisor of an Individual Voluntary Arrangement;
- our bank, BACS, the Cash ISA Transfer Service, the Direct Debit Scheme;
- organisations engaged in the process of making or receiving payments;
- the Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us;
- central government, statutory and regulatory bodies including Financial Services Compensation Scheme, Reclaim Fund Ltd, Tax Authorities, HMRC, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority and Bank of England;
- fraud prevention agencies;
- law enforcement agencies;
- credit rating agencies;
- market research companies;
- any investor, potential investor, funder, purchaser in or of our business or any part of our business and their advisers;
- anyone to whom we transfer our rights and duties under your Agreement with us, together with their advisers;
- any business with which we are seeking to merge and their advisers, or
- our advisers, auditors, agents and suppliers who act or may act on our behalf.

12. How long we will hold your data for

We will usually keep your personal data for 7 years from the later of the date of your application or the date you cease to have any accounts with us. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

13. Fraud prevention agencies

Before we provide services we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

Your personal data will be used to prevent fraud and money laundering, and to verify your identity.

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

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify 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.

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.

13.1 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 services you have requested, 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. If you have any questions about this, please contact us on the details above.

13.2 Data Transfers

Fraud prevention agencies may transfer your personal data outside of the European Economic Area. If they do so, they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

14. If you choose not to give us personal data

You will need to provide us with the personal data we request, either to enable us to consider your application for a savings account or to administer the account.

If you don't give us the information we request, then it may prevent us from being able to respond to your request, open or administer an account. It may also affect our ability to meet our contractual or legal obligations.

15. Your legal rights

You have a number of rights over your personal data processed by us. These include your rights to request:

- **access to your personal data.** You may request a copy of the personal data that we hold about you.
- **accuracy of your personal data.** You may request that we correct incomplete, inaccurate or outdated personal data. We take sensible steps to make sure that personal data is accurate, complete, and current. You can help us do this by notifying us of any changes to your personal data.
- **transmission of personal data.** You may request that we transfer personal data you have provided to us to you or to another person.
- **erasure of personal data.** You may request that we delete your personal data.
- **that the processing of your personal data be restricted.** You may request that our use of your personal data ends, is restricted or limited.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the right(s) are not applicable. If we do not act on your request, we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data, including details of the relevant fraud prevention agencies we use, or wish to make a request to exercise any of your rights under applicable Data Protection laws, please contact our Data Protection Officer.

16. Sending your personal data outside the United Kingdom and the European Economic Area

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

17. How to complain

If you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data, then please contact us to let us know.

You are also entitled to complain to the Information Commissioner's Office:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Website: www.ico.org.uk

Tel: 0303 123 1113

Email: casework@ico.org.uk

We can provide literature in large print, Braille and audio. Please ask us for this leaflet in an alternative format if you need it.

chartersavingsbank.co.uk

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