

Fair processing notice for customers and suppliers – January 2021

About this Fair Processing Notice

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- Note:
- You have the right to object to us processing your personal data – please see section 9(e) below
1. **Who we are**

We are Hampshire Trust Bank Plc. We are a bank registered in England and Wales under company number 01311315 and we have our registered office at 55 Bishopsgate, London EC2N 3AS. We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority. Our FRN is 204601.

We are the **data controller** for information that you provide to us and of information that we hold about you from third parties.
 2. **Our Data Protection Officer and how to contact our Data Protection Officer**

Our Data Protection Officer is Scott Southgate. You can contact our Data Protection Officer in one of the following ways:

 - by writing to our **Data Protection Officer at Data Protection Officer, Hampshire Trust Bank Plc, 55 Bishopsgate, London EC2N 3AS**
 - by sending an e-mail to our Data Protection Officer at dataprotectionofficer@htb.co.uk
 3. **What kinds of personal data we collect and hold about you and where we get it from**
 - Savings customers
 - Specialist Business Finance customers
 - Specialist Mortgages customers
 - Development Finance customers
 - Suppliers, brokers and other people we do business with
 - a. **Savings customers**

Where:

 1. you are an individual opening an account either solely or jointly with another person for your own account, trustee, a partner in a partnership or as a member of an unincorporated club or association or as an attorney on someone's behalf; or

Fair processing notice for customers and suppliers (cont.)

2. our customer opening an account is a company or other incorporated entity and you are a relevant individual such as an owner, director and officer or authorised signatory on the account;

then we will collect and process the following types of personal data about you:

- all the information about you in the account opening application form when applying to open a savings account with us either on-line or by paper application, all the information given to us over the phone, by e-mail, by post or via our website when opening a savings account, such as your name, address, and contact details.
- all the documents sent to us when applying to open an account with us, such as copies of your passport, drivers licence and utility bills.
- all the information given to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the account, such as updated contact information and bank details.
- all the information about you that your associates, agents, brokers, representatives and professional advisers provide to us when acting on your behalf.
- the information relating to the operation of your account such as account balance, payments, interest rate, and withdrawals.
- your credit score results, financial crime check results and identification verification information that we receive from credit reference agencies, fraud prevention agencies and other professional third party suppliers who verify information that is provided to us in connection with the account.
- we also obtain relevant information about you from certain public registers, such as HM Companies House and The Charities Commission, and where you are a foreign national, relevant foreign registries. We may also obtain information about you from a search of publically available information on the internet where this is relevant to your account with us.

b. Specialist Business Finance customers

Where:

1. you are an individual applying for or entering into a loan, hire-purchase or lease arrangement or giving a guarantee or other security either solely or jointly with another person for your own account or as an attorney, trustee, a partner in a partnership or as a member of an unincorporated club or association; or
2. our customer or person applying for or entering into a loan, hire-purchase or lease arrangement or giving a guarantee or other security is a company or other incorporated entity and you are a relevant individual such as an owner, director and officer or authorised signatory; or
3. you have a loan, hire purchase or lease facility from one of our customers and we have provided funding to this customer to enabling them to make that loan, hire purchase or lease facility to you or if we have bought your loan, hire purchase or lease agreement from the company who made the facility available to you;

then we may collect and process the following types of personal data about you:

- all the information that you, our customer or the broker provides to us when obtaining a quote or applying for a loan, hire-purchase or lease facility with us either on-line or by paper application, all the information that you, our customer or the broker gives to us over the phone, by e-mail, by post or via our website when obtaining a quote or apply for a loan, hire-purchase or lease facility with us, such as your name, address, contact details, asset details and finance requirements.
- all the documents that you, our customer or the broker sends to us when obtaining a quote or applying for a loan, hire-purchase or lease facility with us, such as copies of your passport, drivers licence and utility bills.

Fair processing notice for customers and suppliers (cont.)

- all the information that you, our customer or the broker gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the loan, hire-purchase or lease facility, such as updated contact information and your bank details.
 - information that our customers provide to us about you where we provide funding to our customers to enable them to provide you (or the businesses that you work for) with loan, hire-purchase or lease facilities or where we purchase your loan, hire purchase or lease agreement.
 - the information relating to the operation of the loan, hire-purchase or lease arrangement such as account balance, payments, interest rate, and payments.
 - your credit score results, financial crime check results and identification verification information that we receive from credit reference agencies, fraud prevention agencies and other professional third party suppliers who verify information that is provided to us in connection with the facility.
 - where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are providing facilities to a company of which you are a director, confirming you are a director of a company.
 - where relevant, information provided by your or our professional advisers during the course of providing loan, hire-purchase or lease facilities such as valuers, solicitors and accountants. This could include, for example, valuations or financial information.
 - valuation information relating to the assets financed, hired or leased or over which we have security.
 - we obtain relevant information about you from HM Companies House, The Charities and where you are a foreign national, relevant foreign registries. We may also obtain relevant information about you from a search of publically available information on the internet.
- c. Specialist Mortgages customers**
- Where:
1. you are an individual applying for a mortgage, entering into a mortgage or giving a guarantee or other security either solely or jointly with another person for your own account or as an attorney, trustee, a partner in a partnership or as a member of an unincorporated club or association; or
 2. our customer or person applying for a mortgage, entering into a mortgage or giving a guarantee or other security is a company or other incorporated entity and you are a relevant individual such as an owner, director and officer or authorised signatory;
- then we will collect and process the following types of personal data about you:
- all the information that you, our customer or the broker provides to us when applying for a mortgage facility with us either on-line or by paper application, all the information that you, our customer or the broker gives to us over the phone, by e-mail, by post or via our website when applying for a mortgage facility with us, such as your name, address, contact details, property details and finance requirements.
 - all the documents that you, our customer or the broker sends to us when applying for a mortgage facility with us, such as copies of your passport, drivers licence and utility bills.

Fair processing notice for customers and suppliers (cont.)

- all the information that you, our customer or the broker gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the mortgage, such as updated contact information and your bank details.
- the information relating to the operation of the mortgage such as account balance, interest rate and payments.
- your credit score results, financial crime check results and identification verification information that we receive from credit reference agencies, fraud prevention agencies and other professional third party suppliers who verify information that is provided to us in connection with the facility.
- where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are providing facilities to a company of which you are a director, confirming you are a director of a company.
- where relevant, information provided by your or our professional advisers during the course of providing the mortgage facility such as valuers, solicitors, architects, monitoring surveyors, estate agents and accountants. This could include, for example, valuations, financial or property information.
- valuation information relating to the property or other security.
- information from our own internet searches, for example location and property information from websites like google maps or information to support background checks, for example previous property developments where this is relevant to your track record in developments.
- we obtain information about you from HM Companies House, HM Land Registry and The Charities Commission. We may also obtain relevant information about you from a search of publically available information on the internet.

d. Development Finance customers

Where:

1. you are an individual applying for or entering into a loan facility or giving a guarantee or other security either solely or jointly with another person for your own account or as an attorney, trustee, a partner in a partnership or as a member of an unincorporated club or association; or our customer or person applying for a loan facility or giving a guarantee or other security is a company or other incorporated entity and you are a relevant individual such as an owner, director and officer or authorised signatory;

then we will collect and process the following types of personal data about you:

- all the information that you, our customer or the broker provides to us when applying for the loan facility with us, all the information that you, our customer or a broker gives to us over the phone, by e-mail, by post when applying for a loan facility with us, such as your name, address, contact details, property details and finance requirements.
- all the documents that you, our customer or the broker sends to us when applying for a loan facility with us, such as copies of your passport, drivers licence and utility bills.
- all the information that you, our customer or the broker gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the loan facility, such as updated contact information and your bank details.
- the information relating to the operation of the loan facility such as account balance, interest rate, and payments.
- your credit score results, financial crime check results and identification verification information that we receive from credit reference agencies, fraud prevention agencies and other professional third party suppliers who verify information that is provided to us in connection with the facility.

Fair processing notice for customers and suppliers (cont.)

- where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are providing facilities to a company of which you are a director, confirming you are a director of a company.
- where relevant, information provided by your or our professional advisers during the course of providing the loan facility such as valuers, solicitors, architects, monitoring surveyors, estate agents and accountants. This could include, for example, valuations, financial or property information.
- valuation information relating to the property or other security.
- information from our own internet searches, for example location and property information from websites like google maps or information to support background checks, for example previous property developments where this is relevant to your track record in developments.
- we obtain information about you from public registers such as HM Companies House, HM Land Registry and the Charities Commission. We may also obtain information about you from a search of publically available information on the internet.

e. Suppliers, brokers and other people we do business with

Where:

1. you are a sole trader, a partner in a partnership or a member of an unincorporated club or association or an employee of one of these providing goods or services to us or introducing business to us; or
2. our supplier or introducer is a company or other incorporated entity and you are a relevant individual such as an owner, officer, authorised signatory or employee with whom we deal in the provision of those goods or services or in relation to the introduction of business;

then we will collect and process the following types of personal data about you:

- all the information that you, our supplier or the broker provides to us when tendering for or negotiating for broker agreements or the supply of goods or services contracts, for example name, address, contact details, and the credentials of key people broking or providing the goods or services or running the supplier
- all the information that you, our supplier or the broker gives to us over the phone, by e-mail, by post or via our website when we contact each other from time to time during the course of managing the broking or supply of goods or services, for example, updated contact information and bank details
- your credit score results, financial crime check results and identification verification information that we receive from credit reference agencies, fraud prevention agencies and other professional third party suppliers who verify information that is provided to us during our broker or supplier take-on process and during the course of managing the broker or supplier relationship
- where relevant, third party references we obtain as to your suitability as brokers / suppliers.
- where relevant, the information about you that we obtain from public registers such as HM Companies House, HM Land Registry or the Charity Commission. This will usually be to confirm your status, for example, where we are providing facilities to a company of which you are a director, confirming you are a director of a company
- where relevant, information provided by your or our professional advisers during the course of the broker or supplier take-on and on-going broker or supplier relationship management, such as from solicitors and accountants
- information from our own internet searches, for example location and services information or reviews from websites or information to support background checks where this is relevant to your track record as a broker or supplier

Fair processing notice for customers and suppliers (cont.)

- we obtain information about you from public registers such as HM Companies House, HM Land Registry and The Charities Commission. We may also obtain information about you from a search of publically available information on the internet

4. Why we collect your personal data and what we use it for

- Savings customers
- Property Finance customers
- Specialist Mortgages customers
- Specialist Business Finance customers
- Suppliers, brokers and other people we do business with

a. Savings customers

We collect and process your personal data:

- so that we can properly provide our services to you, including for example, to open your account, receive money into your account, take instructions and operate your account, pay funds out of your account and close your account.
- so that we can fulfil our legal and regulatory obligations, for example, to identify our customers and undertake proper checks on our customers to help prevent and detect crime.
- to comply with our legal and regulatory obligations, for example, to report to regulators and authorities about the products and services that we provide to you to offer you products and services.
- to maintain and improve the quality of our products and the way we provide our services.
- to protect and defend our legal rights.

b. Asset Finance customers

We collect and process your personal data:

- so that we can properly provide our services to you, including for example, purchase the asset for hire-purchase or lease, open your account, enter into the loan, hire-purchase or lease, take instructions and operate your account, manage the relationship with you, manage our credit risk, deal with payments, deal with the asset at the end of the hire-purchase or lease and close your account.
- to undertake credit checks and to help prevent and detect crime where you are a customer of our customer and we have provided funding to our customer to enable our customer to make a hire purchase or lease facility to you or if we have bought your hire purchase or lease agreement from the company who made the facility available to you.
- so that we can fulfil our legal and regulatory obligations, for example, to identify our customers and undertake proper checks on our customers to help prevent and detect crime.
- to comply with our legal and regulatory obligations, for example, to report to regulators and authorities about the products and services that we provide to you.
- to offer you products and services.
- to maintain and improve the quality of our products and the way we provide our services.
- to protect and defend our legal rights.

c. Specialist Mortgages customers

We collect and process your personal data:

- so that we can properly provide our services to you, including for example, assess the proposed mortgage facility, open your account, undertake appropriate property due diligence, provide the mortgage facility, take instructions and operate your mortgage account, manage the relationship with you, manage our credit risk, deal with payments, deal with repayment and close your account.

Fair processing notice for customers and suppliers (cont.)

- so that we can fulfil our legal and regulatory obligations, for example, identify our customers, to undertake proper checks on our customers to help prevent and detect crime.
- to comply with our legal and regulatory obligations, for example, to report to regulators and authorities about the products and services that we provide to you.
- to offer you products and services.
- to maintain and improve the quality of our products and the way we provide our services.
- to protect and defend our legal rights.

d. Development Finance customers

We collect and process your personal data:

- so that we can properly provide our services to you, including for example, assess the proposed loan facility, open your account, undertake appropriate property due diligence, provide the loan facility, take instructions and operate your loan account, manage the relationship with you, manage our credit risk, deal with payments, deal with repayment and close your account.
- so that we can fulfil our legal and regulatory obligations, for example, to identify our customers and to undertake proper checks on our customers to help prevent and detect crime.
- to comply with our legal and regulatory obligations, for example, to report to regulators and authorities about the products and services that we provide to you.
- to offer you products and services.
- to maintain and improve the quality of our products and the way we provide our services.
- to protect and defend our legal rights.

e. Suppliers, brokers and other people we do business with

We collect and process your personal data:

- so that we can assess the suitability of the broker or supplier, including undertaking appropriate background checks and on-going monitoring;
- to contact the broker or supplier and manage the broker or supplier relationship and provision of the broking or goods or services; and
- to protect and defend our legal rights.

5. The legal basis upon which we collect, process and store your personal data

The UK's data protection law allows the use of personal data where its purpose is legitimate and isn't outweighed by the interests, fundamental rights or freedoms of data subjects. The law calls this the **legitimate interests** condition for personal data processing.

As explained above, we only collect, use and store the minimum amount of personal data about you that is necessary for us provide our customers with our products and services and to comply with our legal and regulatory obligations arising as a result of us providing those products and services to our customers. Accordingly, the primary basis that we collect, use and store you information is because we have a **legitimate interest** to do so as a regulated bank providing these products and services to our customers.

Our legitimate interests include:

- to act as a prudent and responsible lender and financial institution;
- to undertake identity checks, reference checks, credit checks and risk assessments;
- to help combat financial crime including tax evasion, bribery, fraud and money-laundering;
- to maintain effective technology platforms that underpin our business;

Fair processing notice for customers and suppliers (cont.)

- to maintain network and information security;
- to meet our legal and regulatory obligations;
- to protect and defend our legal rights;
- to maintain accurate records including customer preferences;
- to enhance, modify and improve our products and services;
- for direct marketing (except if we have asked you for your consent and you have not given it to us);
- to manage third party relationships; and
- to pursue our commercial objectives as a bank where this does not override your rights and freedoms as a data subject.

When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

If we have asked you for your consent to process your information for marketing purposes and you have not given it to us then we will not process your information for marketing purposes. If we process your personal data for marketing purposes either with your consent or under the soft opt-in principle and you decide that you do not wish to receive marketing from us then we will stop processing your information for marketing purposes at any time you tell us that you no longer wish to receive marketing from us.

We may process some of your personal information on the basis of your consent in some circumstances.

Where we do so we will, before we process your information on the basis of your consent, first explain what data we wish to process, why we wish to process that data, how we will process that data and your rights, in particular your right to withdraw your consent, and we will ask you whether you consent to our processing your information in that way.

We may process some of your personal information where this is necessary for us to either fulfil or comply with our obligations to you under a contract we have with you or where this is for your benefit. The particular circumstances will depend on the contract we have and what we have agreed to do in the relevant contract. Examples of this could include where we are providing your information to a payee where we are making a payment on your behalf or dealing with a supplier of equipment we are financing for you or engaging with property valuers to obtain the valuation necessary for us to finance your property purchase.

We may process your information where this is necessary to establish if we have a legal claim, to make a legal claim or to defend a legal claim and includes, for example, where we take enforcement action under a facility or our security or defend claims by third parties. This will include court proceedings as well as any judicial procedure, including in any administrative or out-of-court procedures and also procedures instigated by regulatory bodies.

We may on very rare occasions process your information where this is necessary to protect your vital interests. This could include, for example, if you attended our premises and had an accident and we needed to call for urgent medical help for you or let people know or where we were concerned that you were suffering a mental health issue which meant you were unable to make your own decisions and we were concerned that your financial interests were in severe and imminent danger.

Fair processing notice for customers and suppliers (cont.)

6. Where your personal data is stored and processed

We are based in the UK and our staff are based in the UK and most of the day-to-day processing of your personal information takes place in the UK. However your personal information may be processed by us or one of our appointed suppliers outside of the UK in the following circumstances:

- if you are a foreign national, your personal information may be processed in the relevant country necessary for us to verify your identity, your contact information and address, establish your credit worth and to ensure that you are not a financial crime risk.
- if you have provided us with security for a facility and the security is outside of the UK we will process the relevant information necessary to ensure that our security interests are protected and/or if we have to enforce those rights.
- where an asset we are acquiring or financing for you is supplied from outside the UK and it is necessary to provide your information in connection with that supply.
- we use third party suppliers providing either services, software-as-a-service, cloud based data storage or data processing services where the suppliers themselves or the servers that house that data are located in the European Economic Area.
- some of our suppliers have sub-suppliers in the European Economic Area and in countries outside of the European Economic Area.
- where we must defend or enforce our legal rights in a country outside of UK, such as recovery from a guarantor resident outside of UK.

While countries in the European Economic Area all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection when it comes to personal data.

As a result, if we do send personal data outside of the European Economic Area we will make sure suitable safeguards are in place in accordance with UK data protection requirements, to protect the data. For example, these safeguards might include:

- Sending the data to a country that's been approved by the UK authorities as having a suitably high standard of data protection law. Examples include the European Economic Area, Isle of Man, Switzerland and Canada.
- Putting in place a contract with the recipient containing terms approved by the UK authorities as providing a suitable level of protection.
- Carrying out an international transfer risk assessment to assess the risk of transferring the personal data to the relevant country and assessing whether there are additional safeguards that could be put in place to make the transfer more secure.
- Sending the data to an organisation which is a member of a scheme that's been approved by the UK authorities as providing a suitable level of protection. One example is Binding Corporate Rules.

If your data has been sent overseas like this, you can find out more about the safeguards used from us. Whenever fraud prevention agencies transfer your personal data outside of the UK / European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the UK / European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Fair processing notice for customers and suppliers (cont.)

7. Who we share your personal data with, what personal data we share and why we do so

We do not sell any of your information to third parties, we will not give anyone your information so that they can market to you.

Printers

We may use professional printers to print the account statements, letters and other documents that we send to you from time to time and so we have to share with them the information that needs to be printed into those statements, letters and documents that you receive.

Identification Checks

We use third party suppliers to help us verify your identity. We will provide them with information about your identity that you have provided to us and they will verify the information from data bases that either they hold themselves or from other official sources. For foreign nationals, this may include verifying the information from third parties or records in the relevant country.

Credit Reference Agencies and Fraud Prevention Agencies

In order to receive credit and financial crime check information about you from credit reference agencies we are required, on a reciprocal basis, to share information about you with those credit reference and fraud prevention agencies.

We will pass your details on to credit reference agencies and fraud prevention agencies and we will receive scores and reports from them. You will receive a copy of the Credit Reference Agency Information Notice when you make an application to us which will explain how the three main credit reference agencies Callcredit, Equifax and Experian each use and share personal data they receive about you and/or your business that is part of or derived from or used in credit activity. You can also download or read it by visiting <http://www.experian.co.uk/crain/>

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

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing 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 or financing to you. If you have any questions about this, please contact us on the details provided. Searches we make with credit reference agencies will leave a 'footprint' on your file and we will also provide them with information relating to your performance under your account or facility. These 'footprints' and performance details may be accessed by other financial companies in connection with any applications for credit that you may make to them and may affect your ability to obtain credit with the.

Your application will be assessed using credit reference agency records relating to anyone with whom you have a joint account or similar financial association. Where you make a joint application and such a link does not already exist then one may be created. These links will remain until you file a "notice of disassociation" at the credit reference agencies.

The type of information we share includes, for example, your name, date of birth, address, the fact that you have applied or operate an account with us and whether you have operated your account appropriately.

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Marketing Companies

We may use the services of an online marketing company to send you e-mails about us and relevant products and services we offer. To enable them to send you the e-mails, we provide them with your name and e-mail address and details of the relevant products and services. If you have told us that you do not wish to receive marketing information from us by e-mail then we will not send them any information about you and you will not receive these emails from them.

Survey Companies

We are constantly trying to improve our products and services and we may use the services of an online customer satisfaction survey company to gather your feedback and reviews about us. To enable them to send you the e-mail survey request, we provide them with your name and e-mail address and details of the relevant products and services. If you have told us that you do not wish to receive surveys from us by e-mail then we will not send them any information about you and you will not receive these emails from them.

Regulators

We will share information about you with our regulators in order to meet our regulatory reporting obligations, for example, we share information about you and your account balances with the Bank of England for the purposes of protecting deposits under the Financial Services Compensation Scheme. We will only share the information about you with our regulators that is necessary to meet our legal and regulatory obligations.

Our Auditors

We may be required to share information about you with our auditors in order to verify to them that you are our customer, that the information in our accounts and the information that we share with our regulators is accurate.

Other Banks or Financial Institutions

We may transfer or assign our rights in your account or facility to another bank or financial institution and in that case we may provide them with your information.

Service Providers and Suppliers

We may, from time to time, employ the services of third parties to help us provide our products and services to you or to help us meet our regulatory and reporting obligations and it may be necessary to provide them with some of your personal data in order for them to provide us with the required services. Examples of this could be, in relation to our motor vehicle finance business, providing registrations to third party valuers to provide us with up-to-date valuations or, in relation to our property finance business, providing address details to third party valuers to provide us with up-to-date valuations or providing access to IT service providers who assist us to ensure that our IT systems are safe and secure.

Technology Suppliers

We also provide your information to suppliers of technology service providers who provide the technology infrastructure necessary to run our business, including for example, suppliers who provide our customer account management platforms, our payments systems, our reporting systems, our broker portals and our data storage facilities.

Professional Advisers

We use professional advisers, such as solicitors, valuers, quantity surveyors, to help us provide our products and services and to defend and enforce our legal rights and we will provide them with personal information necessary for them to provide their services.

Fair processing notice for customers and suppliers (cont.)

Collections Agents, Receivers, etc

We will use the services of collections agents and receivers to recover sums of money due to us and/or to recover and sell property or assets that are either owned by us or secured to us.

Legal Obligations

We may be required to provide information about you where we are required to do so to meet a legal obligation, for example, where we are required to do so under a court order.

Please rest assured that we have quality checked all the third parties to whom we send your information and have appropriate contractual arrangements in place with them to make sure that they will only use the information for the purposes that we have sent it to them and that it will be properly protected.

8. How long we will store your personal data

- a. Customers
- b. Suppliers

a. Customers

We will only use your information for as long as we need it in order to provide you with the products and services you have with us. As soon as you have closed your account and we have finalised our administrative work to close the account then we will hold your information in secure storage until we are permitted by law and regulation to permanently erase it.

To comply with our current legal, regulatory and financial crime records retention obligations, we will hold your information for a period of:

1. six years after your account has been closed;
2. six months if you applied for one of our products or services but withdrew your application or were unsuccessful in your application;

These periods will be extended if your information is needed in relation to any civil or criminal proceedings or if we are required to hold it for longer for legal or regulatory reasons or by our regulators, law enforcement agencies or the courts.

b. Suppliers and Brokers

We will only use your information for as long as we need it in order to manage the broker or supplier relationship.

As soon as the broker or supplier relationship has ended and we have finalised our administrative work to close the account then we will hold your information in secure storage until we are permitted by law and regulation to permanently erase it.

To comply with our current legal, regulatory and financial crime records retention obligations, we will hold your information for a period of:

1. six years after the relationship has been terminated;
2. six months if we began negotiating a broker or supply arrangement but did not enter into a broker or supply arrangement;

These periods will be extended if your information is needed in relation to any civil or criminal proceedings or if we are required to hold it for longer for legal or regulatory reasons or by our regulators, law enforcement agencies or the courts.

9. Your rights to your personal data

We recognise that your information is your information - it does not belong to us. You have a number of important rights which put you in control of your information. To help you understand your rights, we will explain them below.

a. Your right of access to your personal data

You can ask us at any time to tell you what personal data we hold about you and we will do so, without undue delay, and in any event within one month of receipt of your request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. We will tell you of any such extension within one month of receipt of your request, together with the reasons for the delay. Where you make the request by electronic form means, we will provide the information by electronic means where possible, unless otherwise requested by you.

Fair processing notice for customers and suppliers (cont.)

We will not charge you any fee for providing this information (unless the request is manifestly unfounded or excessive, in which case we may charge you a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested alternatively we may be entitled to refuse the request). If you request more than one copy of the information then we may charge you a reasonable fee for the administration of producing the additional copies.

We may ask you to provide us with information to verify your identity before providing you with the information requested.

b. Your right of rectification to your personal data

You have the right to have any personal data that we hold about you corrected if it is wrong or completed if it is incomplete. To have it corrected or completed, simply tell us what information is wrong or incomplete and give us the correct and complete information. We will update or complete it without undue delay. We may ask you to provide supporting evidence to verify the information you are giving to us for example, proof of address where you tell us that the address details we hold about you are wrong.

c. Your right of erasure of your personal data (also known as the right to be forgotten)

In some circumstances you have the right to have the personal data that we hold about you permanently erased. You will have this right (1) when it is no longer necessary for us to process your personal data or (2) if there is no legal basis for us to process your personal data or (3) if we unlawfully process your personal data or (4) to comply with a legal obligation to which we are subject. If you believe that any of these circumstances apply to you then please tell us and we will ensure that your personal data is permanently erased without undue delay if one of these circumstances do exist.

Where we permanently erase your personal data we will also take reasonable steps to inform any third parties to whom we have provided your personal data of your request to have the personal data erased.

d. Your right to have processing of your personal data restricted

In some circumstances you have the right to have the processing of your personal data restricted. You will have this right

- if you tell us that your personal data is inaccurate, for a period enabling us to verify its accuracy; or
- if we are not processing your personal data lawfully and you tell us that you would rather have us restrict the processing or erase it; or
- we no longer need your personal data but you need us to store it because you need it for the establishment, exercise or defence of legal claims; or
- if you have objected to us processing your personal data, for a period enabling us to verify whether the legitimate grounds on which we are processing it override your grounds for objection.

This is not an absolute right, and your personal data may still be processed where certain grounds exist.

This is:

- with your consent;
- for the establishment, exercise, or defence of legal claims;
- for the protection of the rights of another natural or legal person;
- for reasons of important public interest.

Only one of these grounds needs to be demonstrated to continue data processing.

We will consider and respond to requests we receive, including assessing the applicability of these exemptions. We will tell you once a restriction on processing has been applied and before lifting any restriction.

Fair processing notice for customers and suppliers (cont.)

Where we restrict the processing of your personal data we will also take reasonable steps to inform any third parties to whom we have provided your personal data of your request to have the personal data restricted.

e. Your right to object to the processing of your personal data

As explained in this Fair Processing Notice, we process your personal data because we have either a **legitimate interest** in doing so or another lawful basis for do so as explained in this Fair Processing Notice. However, you have the right object to us processing your personal data, on grounds relating to your particular situation. If you object then we will stop processing your personal data unless we can show compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. For example, where we detect fraud it is unlikely that your objection may prevent us supplying that information to fraud prevention agencies and legal authorities. Another example is that it is unlikely that your objection may prevent us reporting to the regulator in relation to your account even if you object to us processing your personal data.

The only exception to this relates to where you have previously given consent to us (e.g. to market to you) and you change your mind and object to us using your personal data for that purpose. In this case we will without undue delay stop the processing and we will take your objection as a withdrawal of that consent and we will update your preferences.

f. Your right to data portability

New data protection legislation also contains a right to data portability that may give consumers a right in some data processing contexts, to receive their personal data in a portable format when it's processed on certain grounds, such as consent. This is unlikely to be a right that will apply to your personal data because we process your personal data primarily on the grounds of legitimate interests however you may check whether we process any of your data on a basis that gives you a right to data portability.

g. Your right not to be subject to automated decision making and profiling

New data protection legislation also contains a right not to be subject to a decision based solely on automated processing. We do not make any decisions based solely on automated processing.

h. Your right to complain to the Information Commissioner

If you are not satisfied with the way that we have processed your personal data or the way that we have dealt with you when exercising any of your rights then you may follow our complaints procedure by following this link <https://www.htb.co.uk/complaints>

You may also refer your concerns to the Information Commissioner's Office (or ICO), the body that regulates the handling of personal data in the UK. You can contact them by:

1. Phone on **0303 123 1113**
2. Writing to them at **Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF**
3. Going to their website at www.ico.org.uk

10. Important information for children

We do not offer products or services to children – i.e. anyone under the age of 18. However we may collect and process information about children when it is necessary and incidental to the provision of our products and services. Examples of this include where children are beneficial owners of a company which is our customer and in these circumstances we process the child's personal data so that we can properly understand who is our customer and meet our combating financial crime obligations.

We will not send marketing information to children.

If you are a child whose personal data we hold then please be aware that this Fair Processing Notice also relates to you and you should read it so that you understand how we process your personal data.

Please note that children have the same rights to their personal data, as explained in this Fair Processing Notice, as an adult.