



# Our Privacy Notice

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## HOW WE USE YOUR PERSONAL INFORMATION

This privacy notice is to let you know how we look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. This notice also tells you about your privacy rights and how the law protects you.

## PERSONAL INFORMATION AND THE LAW

### 1. WHO WE ARE

Your information will be held by Tipton & Coseley Building Society.

This Privacy Notice covers any products or services you have with us, including savings and mortgages. Sometimes we may need to provide you with separate or further information about specific products and services. This information will also apply.

Some of the links on our website lead to non-Tipton & Coseley Building Society websites. You'll need to make sure you're happy with their privacy notices when visiting/using those other sites.

Wherever we've said 'you' or 'your', this means you, any authorised person on your account, anyone who does your banking or deals with us for you (e.g. trustees or executors, attorneys under a Power of Attorney) and other related people (including authorised signatories, partners, members and trustees).

When we say 'we', we mean the Tipton & Coseley Building Society which acts as a data controller in respect of your personal data.

The address for the Tipton & Coseley Building Society is 70 Owen Street, Tipton, West Midlands, DY4 8HG, 0121 557 2551. You can find out more about us at: [www.thetipton.co.uk](http://www.thetipton.co.uk).

If you have any questions about this Privacy Notice or wish to find out about any of your rights mentioned in it, please contact our Data Protection Officer (DPO) at the above address, or via our website.

This Privacy Notice may be updated from time to time and the most recent version can be found at [www.thetipton.co.uk](http://www.thetipton.co.uk). This notice was last updated in January 2024..

### 2. HOW THE LAW PROTECTS YOU

Data Protection law says that we can process your personal information only if we have a genuine reason to do so. This also includes sharing it outside Tipton & Coseley Building Society. The law says we must have complied with one or more of the following reasons, prior to processing your personal information:

- To fulfil a contract we have with you; or
- When it is our legal duty; or
- When it is in our legitimate interest; or
- When you consent to it; or
- When it is in the substantial public interest, for example, to support you if you are, or become, vulnerable due to your personal circumstances. This applies in the case of sensitive personal data, also known as special category data.

When we have a business or commercial reason to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going to rely on it as the reason for processing your personal information. Even then, it must not unfairly go against your interests.

The law and other regulations treat some types of sensitive personal information as special. Please see Section 3 -Groups of Personal Information- below for further detail. . We will not collect or use this type of personal information without your consent unless the law allows us to do so. If we do, it will only be when it is necessary:

- For reasons of substantial public interest; or
- To establish, exercise or defend legal claims.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are:

What we use your personal information for.	Our reasons.	Our legitimate interests.
<b>Serving you as a customer</b>		
<ul style="list-style-type: none"> <li>• To manage our relationship with you or your business.</li> <li>• To develop and carry out marketing activities.</li> <li>• To study how our customers, use products and services from us and other organisations.</li> <li>• To communicate with you about our products and services.</li> <li>• To develop and manage our brand, products and services.</li> <li>• To correspond with solicitors, surveyors, valuers, other lenders, conveyancers and third-party intermediaries.</li> </ul>	<ul style="list-style-type: none"> <li>• Your consent.</li> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Keeping our records up to date, working out which of our products and services may interest you and telling you about them.</li> <li>• Developing products and services, and what we charge for them.</li> <li>• Defining types of customers for new products or services.</li> <li>• Seeking your consent when we need it to contact you.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<b>Business improvement</b>		
<ul style="list-style-type: none"> <li>• To test new products.</li> <li>• To manage how we work with other companies that provide services to us and our customers.</li> <li>• To develop new ways to meet our customers' needs and to grow our business.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Developing products and services, and what we charge for them.</li> <li>• Defining types of customers for new products or services.</li> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
<b>Managing our operations</b>		
<ul style="list-style-type: none"> <li>• To deliver on our products and services.</li> <li>• To make and manage customer payments.</li> <li>• To manage fees, charges and interest due on customer accounts.</li> <li>• To collect and recover money that is owed to us.</li> </ul>	<ul style="list-style-type: none"> <li>• Fulfilling contracts.</li> <li>• Our legitimate interests.</li> <li>• Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>• Being efficient about how we fulfil our legal and contractual duties.</li> <li>• Complying with rules and guidance from regulators.</li> </ul>

Managing security, risk and crime prevention		
<ul style="list-style-type: none"> <li>To detect, investigate, report, and seek to prevent financial crime.</li> <li>To manage risk for us and our customers.</li> <li>To obey laws and regulations that apply to us.</li> <li>To respond to complaints and seek to resolve them.</li> </ul>	<ul style="list-style-type: none"> <li>Fulfilling contracts.</li> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Developing and improving how we deal with financial crime, as well as fulfilling our legal duties in this respect.</li> <li>Complying with rules and guidance from regulators.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>

Business Management		
To run our business in an efficient and proper way. This includes managing our financial position, business capability, adding and testing systems and processes, managing communications, corporate governance, and audit.	<ul style="list-style-type: none"> <li>Our legitimate interests.</li> <li>Our legal duty.</li> </ul>	<ul style="list-style-type: none"> <li>Complying with rules and guidance from regulators.</li> <li>Being efficient about how we fulfil our legal and contractual duties.</li> </ul>
To exercise our rights set out in agreements or contracts.	Fulfilling contracts.	

For processing special categories of personal information.	
Our reasons	
Substantial public interest.	<ul style="list-style-type: none"> <li>Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour.</li> <li>Where it might be unreasonable to obtain your specific consent, we may process health information (concerning physical or mental injury, illness or disability) if you are a customer at economic risk and we believe it is necessary for the purpose of protecting your financial well-being. For example, to support you if you are, or become, vulnerable due to your personal circumstances.</li> </ul>
Responding to regulatory requirements.	<ul style="list-style-type: none"> <li>Passing information to the regulator as needed to allow investigation into whether we have acted in the right way.</li> </ul>
Legal claims.	Using any special categories of personal information as needed to establish, exercise, or defend legal claims.
Consent.	Telling you that we need your consent to process special categories of personal information, when that is what we rely on for doing so.

### 3. GROUPS OF PERSONAL INFORMATION

We process all kinds of personal information. Listed below so that you can see what we may know about you. We don't use all this personal information in the same way. Some of it is useful for marketing, or for providing services to you. But some of it is private and sensitive and we manage and treat it that way.

The types of personal information about you we may process:

Type of personal information	Description
Financial	Your financial position, status and history.
Contact	Your name, where you live, and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social or income groupings.
Transactional	Details about payments to and from your accounts with us.

Contractual	Details about the products or services we provide to you.
Behavioural	Details about how you use products and services from us and other organisations.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters and emails you write to us, and conversations between us.
Social Relationships	Your family, friends, and other relationships.
Open data and public records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
Usage data	Other data about how you use our products and services.
Documentary data	Details about you that are stored in documents in different formats, or copies of them. This could include your passport, drivers licence, or birth certificate.
Special categories of data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these if the law allows us to do so:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Religious, political or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic and bio-metric data</li> <li>• Health data</li> <li>• Lifestyle information, including data related to sex life or sexual orientation</li> <li>• Criminal records of convictions and offences</li> <li>• Allegations of criminal offences</li> </ul> <p>You can read how we may use special types of personal information in the section 'How the law protects you'.</p>
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you, whether you get paper statements, or prefer large-print formats.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number or social security number, or Tax Identification Number (TIN).

#### 4. WHERE WE COLLECT PERSONAL INFORMATION FROM

This section lists all the places where we get your personal information from. We may collect personal information about you (or your business) from any of these sources:

We'll only collect your personal information in line with relevant regulations and law. We may collect it from a range of sources, and it may relate to any of our products or services you apply for, current or have held in the past. We may also collect information about you when you interact with us, e.g. visit our websites or mobile channels, call us or visit one of our branches, or ask about any of our products and services.

Some of it will come directly from you, e.g. when you provide ID to open an account. It can also come from your financial advisor, broker or mortgage intermediary or other sources you've asked us to obtain information from. We might also get some of it from publicly available sources.

You're responsible for making sure the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible. If you provide information for another person (e.g. a joint account holder or a dependant), you'll need to direct them to this notice.

The information we collect may include:

**Information that you provide to us, e.g.:**

- Personal details, e.g. name, previous names, gender, date and place of birth.
- Contact details, e.g. address, email address, landline and mobile numbers.
- Information concerning your identity e.g. photo ID, passport information, National Insurance number, National ID card and nationality.
- Market research, e.g. information and opinions expressed when participating in market research.
- User login and subscription data, e.g. login credentials for phone and online banking and mobile banking apps.
- Other information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise.

**Data from outside organisations, e.g.:**

- Credit Reference Agencies - some of the personal information obtained from Credit Reference Agencies will have originated from publicly accessible sources. In particular, Credit Reference Agencies draw on court decisions, bankruptcy registers and the electoral register (also known as the electoral roll).
- Social networks and other technology providers (for instance, when you click on one of our Facebook or Google ads).
- Fraud Prevention Agencies.
- Other financial services companies (to fulfil a payment or other service as part of a contract with you, or to help prevent, detect and prosecute unlawful acts and fraudulent behaviour);
- Public information sources such as the Electoral Register or Companies House.
- Agents, suppliers, sub-contractors and advisers - these can be types of firms we use to help us run accounts and services. They can also be specialist companies who advise us on ways to develop and improve our business.
- Market researchers (who combine data from many sources to produce market trend reports and advice) - these firms may get in touch with you on our behalf to ask you for your opinions and feedback. Sometimes these firms will combine what you tell them with data from other sources to study it. They will use this to produce reports and advice that help us understand our customers' point of view, so that we can improve the way we work as a business.
- Firms providing data services (we receive reports that we use to better understand our customers and look for general patterns and trends).
- Government and law enforcement agencies.

**5. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We keep your information in line with our Document Retention Policy. For example, we'll normally keep your personal information related to savings products for a period of six years from the end of our relationship with you and for mortgage products, fifteen years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

We may need to retain your personal information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it promptly. All information is stored securely at our Head Office and branches. We retain the right to store information electronically.

**6. COOKIES**

Cookies are small computer files that get sent to your PC, tablet or mobile phone by websites when you visit them. They stay on your device and get sent back to the website they came from when you go there again. Cookies store information about your visits to that website, such as your choices and other details. Some of this data does not contain personal details about you or your business, but it is still protected by this Privacy Notice.

To find out more about how we use cookies, please see our Cookies Policy.

## THE CONTROL YOU HAVE

### 7. IF YOU CHOOSE NOT TO GIVE PERSONAL INFORMATION

You can choose not to give us personal information. In this section we explain the effects this may have.

We may need to collect personal information by law, or to enter into or fulfil a contract we have with you. If you choose not to give us this personal information, it may delay or prevent us from fulfilling our contract with you or doing what we must do by law. It may also mean that we cannot administer your accounts. It could mean that we have to cancel a product or service you have with us.

We sometimes ask for personal information that is useful, but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the products or services you have with us.

### 8. YOUR RIGHTS

You have a number of rights in relation to the personal information that we hold about you. You can exercise your rights by contacting us. You can visit one of our branches, write to us or call us on 0121 5572551. Calls may be monitored or recorded. These rights include:

#### Your right of access:

- The right to access personal information we hold about you and to obtain information about how we process it.
- In some circumstances, the right to withdraw your consent to our processing of your personal information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so.

#### Your right to data portability:

- In some circumstances, the right to receive certain personal information you have provided to us in an electronic format and/or request that we transmit it to a third party.

#### Your right to rectification:

- The right to request that we rectify your personal information if it's inaccurate or incomplete.

#### Your right to erasure:

- In some circumstances, the right to request that we erase your personal information. We may continue to retain your information if we're entitled or required to retain it.

#### Your right to object to or restrict processing:

- The right to object to, and to request that we restrict, our processing of your personal information in some circumstances. Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and/or to refuse that request.

### 9. HOW TO COMPLAIN

Please let us know if you are unhappy with how we have used your personal information. You can contact our DPO on 0121 557 2551 or write to us at our registered address or via our Contact us facility



on our website. You also have the right to complain to the regulator, or to lodge an appeal if you are not happy with the outcome of a complaint. In the UK this is the Information Commissioner's Office. Find out on their website how to report a concern. [www.ico.org.uk/make-a-complaint/](http://www.ico.org.uk/make-a-complaint/)  
Helpline number 0303 123 1113.

#### **10. HOW TO WITHDRAW YOUR CONSENT**

You can withdraw your consent at any time. Please contact us if you want to do so. This will only affect the way we use personal information when our reason for doing so is that we have your consent. See the section 'Your Rights' about more generally restricting use of your personal information. If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

#### **11. LETTING US KNOW IF YOUR PERSONAL INFORMATION IS INCORRECT**

You have the right to question any information we have about you that you think is incorrect. We'll take reasonable steps to confirm this for you and correct it. If you want to do this, you can visit one of our branches, write to us or call us on 0121 5572551. Calls may be monitored or recorded.

#### **12. HOW TO GET A COPY OF YOUR PERSONAL INFORMATION**

You can get a copy of the personal information we hold about you by writing to us at Tipton & Coseley Building Society, 70 Owen Street, Tipton, West Midlands, DY4 8HG.

## **HOW PERSONAL INFORMATION IS USED**

#### **13. WHO WE SHARE YOUR PERSONAL INFORMATION WITH**

We may share your personal information with outside organisations. This is so that we can provide you with products and services, run our business, and comply with rules that apply to us. Here we list all the types of organisation that we may share your personal information with:

- Any sub-contractors, agents or service providers who work for us or provide services to us (including their employees, sub-contractors, service providers, directors and officers).
- Any joint account holders, trustees, beneficiaries or executors.
- Any brokers/mortgage intermediaries who introduce you to us or deal with us for you.
- Companies we have a joint venture or agreement to co-operate with.
- People you make payments to and receive payments from.
- Other financial institutions, tax authorities, trade associations, credit reference agencies, payment service providers and debt recovery agents.
- Anybody who provides marketing services to us.
- Any people or companies where required in connection with a potential or actual merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you.
- Law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities.
- Other parties involved in any disputes, including disputed transactions.
- Fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity.
- Anyone who provides instructions or operates any of your accounts on your behalf, e.g. Power of Attorney, solicitors, intermediaries, etc.
- Anybody else that we've been instructed to share your information with by either you, a joint account holder or anybody else who provides instructions or operates any of your accounts on your behalf.

### **Data sharing between the Tipton & Coseley Building Society and the Money and Pensions Service**

The Tipton & Coseley Building Society and the Money and Pensions Service (the Parties) have entered into a data sharing agreement. With respect to the shared data both parties are deemed to be joint data controllers.

#### **Objective of the data sharing**

The overall objective of the Parties in sharing the shared data is to:

- Connect customers of the Tipton & Coseley Building Society who have indicated that they may benefit from debt advice with a debt advice agency with the appropriate capacity through a choice of channels.
- Track the customer journey from the point of referral through the debt advice process and outcomes with the aim of enhancing experience for all stakeholders.

#### **Personal data to be shared**

- Customer's full name.
- E-mail address.
- Telephone number.
- Information relating to customers' use of the debt advice service and referrals made.

No special category personal data will be transferred between the Parties.

#### **Purposes for which the personal data will be processed**

Data may be shared by the Parties to enable the Money and Pensions Service to connect customers to a Debt Advice Agency to then provide a debt advice service. In order for the Money and Pensions Service to provide this service, it requires us to provide the relevant contact information.

#### **Legal basis for sharing personal data**

We will always ask for your consent before sharing your data for these Purposes.

#### **Your rights**

You have a right to apply your rights regarding both Tipton & Coseley Building Society and the Money & Pension Service at a single contact point. You can do this by contacting us. You can visit one of our branches, write to us or call us on 0121 5572551. Calls may be monitored or recorded.

You may also exercise your rights to each party separately. Information about the processing of personal data is provided by both parties through Privacy Policies/Notices published on their websites.

#### **Sharing data that does not say who you are**

We may share some data with other companies outside Tipton & Coseley Building Society, but only when it is combined with other customers information so that no-one's identity can be identified.

We combine information in this way, so we can look for general patterns and trends, but we would not include any information about who these customers are. When we combine information this way, we use all of the information – including historical data – that we hold about you and our other customers. We do this to learn about the types of customers we have, how they use our products,

and how our products perform for them. The law says this is not considered to be personal information after it has been grouped in this way.

#### **14. HOW WE WORK OUT WHAT MARKETING YOU RECEIVE**

We use marketing to let you know about products, services and offers that you may want from us. This section tells you how we decide what marketing to show or send you. It also explains how we work out what you may be interested in.

We may use your personal information to make decisions about what products, services and offers we think you may be interested in. This is what we mean when we talk about 'marketing'. We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not conflict unfairly with your own interests.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from outside organisations we work with. We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. This is called profiling for marketing purposes. You can contact us at any time and ask us to stop using your personal information this way.

If you allow it, we may show or send you marketing material online (on our own and other websites including social media), in our own and other apps, or by email, mobile phone, or post or through smart devices and other digital channels.

What you get will depend on marketing choices that you set. You can change these at any time and tell us to stop sending you marketing. You can also tell us not to collect data while you are using our websites or mobile apps. If you do, you will still see some marketing, but it will not be tailored to you.

Whatever you choose, you'll still receive statements and other important information such as changes to your existing products and services.

We do not sell the personal information we have about you to outside organisations. We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business. If you change your mind, you can contact us to update your choices at any time.

#### **15. HOW WE USE YOUR INFORMATION TO MAKE AUTOMATED DECISIONS**

This section is relevant where we make decisions about you using only technology, and where none of our colleagues have been involved in the process. Currently we do not operate automated decision making, however this could change in the future.

#### **16. CREDIT REFERENCE AGENCIES (CRAs)**

If you apply for new products or services (including credit like a mortgage) we may perform credit and identity checks on you with one or more credit reference agencies (CRAs). To do this, we will supply your personal information to CRAs, and they will give us information about you. CRAs will supply to us both public (including the electoral register) and fraud prevention information. We may use this information to:

- Assess if we can offer you credit and whether you can afford to take the product you applied for.
- Verify the accuracy of the data you've provided to us.
- Prevent criminal activity, fraud and money laundering.
- Manage your account(s).

- Trace and recover debts.
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us this may leave a search footprint on your credit file that may be seen by other organisations.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner or civil partner – or that you are in business with other partners or directors. You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them. CRAs will also link your records together. These links will stay on your files unless one of you asks the CRAs to break the link. You will normally need to give proof that you no longer have a financial link with each other. You can find out more about the CRAs on their websites.

To find out more about credit checks, read our 'Credit Reference Agency Information' leaflet. You can get it from our website, in any of our branches or you can request a paper copy by contacting us in your preferred way.

## **17. FRAUD PREVENTION AGENCIES (FPAs)**

We'll carry out checks with fraud prevention agencies for the purposes of preventing fraud and money laundering, and to verify your identity before we provide products and services to you. These checks require us to process personal information about you.

We'll process personal information such as your name, address, date of birth, contact details, financial information, employment details, and device identifiers e.g. IP address.

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 information on the basis that we have a legitimate interest in preventing fraud and money laundering and to verify your identity. This enables us to protect our business and to comply with laws that apply to us. This processing is also a contractual requirement of any of our products or services you use.

Fraud prevention agencies can hold your personal information for different periods of time. If they're concerned about a possible fraud or money laundering risk, your data can be held by them for up to six years.

To find out more about Fraud Prevention Agencies checks, read our 'Fraud Prevention Agency' information leaflet. You can get it from our website, in any of our branches, or you can request a paper copy by contacting us in your preferred way.

### **Consequences of Processing**

If we, or a fraud prevention agency, have reason to believe there's a fraud or money laundering risk, we may refuse to provide the services you've requested. We may also stop providing existing products and 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 to you. The information we hold about you could make it easier or harder for you to get credit in the future.

To find out more about fraud prevention checks, read our 'Fraud Prevention Agencies' leaflet. You can get it from our website, in any of our branches or you can request a paper copy by contacting us in your preferred way.

### **18. SENDING DATA OVERSEAS**

Your information may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information.

When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it.

### **19. TRACKING OR RECORDING WHAT YOU SAY OR DO**

To help keep you and your money safe, we may record details of your interactions with us. We may record and keep track of conversations you have with us including phone calls, face-to-face meetings, letters, emails, live chats, video chats and any other kinds of communication. We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions, e.g. telephone numbers that you call us from and information about the devices or software that you use. We use closed circuit television (CCTV) in and around our sites and these may collect photos or videos of you or record your voice. Our websites, apps, and other digital products may track and record your interactions with them.

### **20. HOW WE KEEP YOUR INFORMATION SECURE**

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way.

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our colleagues and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **21. MORE DETAILS ABOUT YOUR INFORMATION**

If you have any questions or want more details about how we use your personal information, you can visit one of our branches, write to us or call us on 0121 557 2551. Calls may be monitored or recorded.

This Privacy Notice is available in large print and braille on request  
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