

# FULL PRIVACY NOTICE

## LOOKING AFTER YOUR INFORMATION

The Data Protection Act requires Lloyds Banking Group companies to manage personal information in accordance with the Data Protection Principles. In particular, our Group of companies is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require. All our employees are personally responsible for maintaining customer confidentiality. We provide training and education to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

## WHO WE ARE

Your information will be held by Scottish Widows Bank, a trading name of Lloyds Bank plc, which is part of the Lloyds Banking Group. More information on the Group can be found at [www.lloydsbankinggroup.com](http://www.lloydsbankinggroup.com)

## WHERE WE OBTAIN YOUR INFORMATION

Your personal information will be held securely in Lloyds Banking Group systems so that we and any other companies in our Group that you have dealings with, either now or in the future, can manage your relationship with us. This will include information you provide when you apply to us, and any additional information provided by you or others in various ways, including:

- a) in applications, emails and letters, during telephone calls and conversations in branch, when registering for services, in customer surveys, when you participate in competitions and promotions, when using Lloyds Banking Group company websites, and during financial reviews and interviews.
- b) from analysis (for example, the amount frequency, location, origin, and recipient) of your payments and other transactions, and your use of services involving other Lloyds Banking Group companies and what they know from operating your account (including the creation of profiles used to uniquely identify you when you use our online, mobile and telephony services) which are used to help us combat fraud and other illegal activity; and
- c) information Lloyds Banking Group companies receive from or through other organisations (for example card associations, credit reference agencies, insurance

companies, retailers, comparison websites, social networks and fraud prevention agencies) whether in the course of providing products and services to you or otherwise, and from information we gather from your use of and interaction with our internet and mobile banking services and the devices you use to access them.

We will not retain your personal information for longer than is necessary for the maintenance of your account, or for legal or regulatory requirements.

## HOW WE SHARE YOUR INFORMATION

We may share the personal information we hold about you across the Lloyds Banking Group for the following administrative activities:

- a) providing you with products and services and notifying you about either important changes or developments to the features and operation of those products and services;
- b) responding to your enquiries and complaints;
- c) administering offers, competitions, and promotions;
- d) undertaking financial reviews;
- e) facilitating the secure access to online platforms.

And also for the following data sharing activities:

- f) updating, consolidating and improving the accuracy of our records;
- g) undertaking transactional analysis;
- h) arrears and debt recovery activities;
- i) testing new systems and checking upgrades to existing systems;
- j) crime detection, prevention, and prosecution;
- k) evaluating the effectiveness of marketing, and for market research and training;
- l) customer modelling, statistical and trend analysis, with the aim of developing and improving products and services;
- m) assessing lending and insurance risks across the Lloyds Banking Group;
- n) managing your relationship with the Lloyds Banking Group companies.

By sharing this information it enables us, and other companies in the Lloyds Banking Group, to better understand your needs and run your accounts in the efficient way that you expect.

Your data may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.

## WHEN WE MAY SHARE YOUR INFORMATION

We will treat your personal information as private and confidential, but may share it with each other and disclose it outside the Lloyds Banking Group if:

- a) allowed by this agreement;
- b) you consent;
- c) needed by our agents, advisers or others involved in running accounts and services for you or collecting what you owe Group companies;
- d) needed by subcontractors to help us manage your records;
- e) HM Revenue & Customs or other authorities require it;
- f) the law, regulatory bodies (including for research purposes), or the public interest permits or requires it;
- g) required by us or others to investigate or prevent crime;
- h) needed by market research companies to assist us in providing better products and services for you;
- i) any other parties connected with your account (including guarantors) need it; or
- j) required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme ("FSCS").
- k) you use price comparison websites or other similar services to research or purchase financial products and services. These providers will use information about you and your relationship with us to help ensure you get the best results from their services, enabling you to make an informed choice.

We will always ensure your information remains safe and secure.

## SHARING YOUR INFORMATION WITH OTHER COMPANIES

If you were 'introduced' to us by a third party and/or have a relationship with or are supporting one of our affinity partners (e.g. a charity credit card account), we will give them your contact details and sufficient information about you to help with their accounting and administration. Introducers or affinity partners may use these details to contact you about products and services unless you have asked them not to do so.

## USING YOUR INFORMATION TO HELP PREVENT TERRORISM AND CRIME

The Government also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

## SHARING YOUR INFORMATION TO ASSIST WITH ASSET BUYING OR SELLING

Lloyds Banking Group companies may in the future wish to sell, transfer or merge part or all of their business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it. If so, they may disclose your personal information to a potential buyer, transferee, or merger partner or seller and their advisers so long as they

agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this notice.

## SHARING YOUR PERSONAL INFORMATION BETWEEN 1ST AND 2ND CHARGE LENDERS (MORTGAGES ONLY)

If you have a secured loan or mortgage with us, we may need to share information with other lenders who also hold a charge on your property.

## JOINT APPLICANTS (SAVINGS ONLY)

If you give personal information about someone else (such as a joint applicant) then you should not do so without their permission. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice.

## SHARING PERSONAL INFORMATION BETWEEN JOINT APPLICANTS

Sometimes, when you open a joint account or product, this may mean that your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice versa.

## HOW WE MANAGE SENSITIVE PERSONAL INFORMATION

The Data Protection Act defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). If you apply to us for insurance, a pension, health insurance or life assurance, we may ask you for some 'sensitive' details. We will only use this information to provide the service you require and we will ask for your explicit consent. As a customer, there may be times when you give us sensitive information. We may share it with other parts of the group and our subcontractors to keep your records up to date.

## USING COMPANIES TO PROCESS YOUR INFORMATION OUTSIDE THE EEA

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information. We may run your accounts and provide other services from centres outside the EEA (such as the USA and India) that do not have a similar standard of data protection laws to the UK. If so, we will require your personal information to be protected to at least UK standards.

We may process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you make a CHAPS payment or a foreign payment. Those external organisations

may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. If these are based outside the EEA, your personal information may not be protected to standards similar to those in the UK.

## USING CREDIT SCORING (MORTGAGES AND POLICY LOANS ONLY)

When you apply for credit, an automated system known as credit scoring may be used when considering whether to agree the borrowing. It is a method of assessing your likely conduct of an account based on a range of data, including the conduct of previous similar accounts. It is a system widely used by credit providers to help make fair and informed decisions on lending.

Credit scoring takes account of information from three sources – the information you provide on your application, information provided by credit reference agencies and information that may already be held about you by companies in the Lloyds Banking Group. A credit scoring system will consider information from these sources, to make an overall assessment of your application.

The credit scoring methods used are regularly tested to ensure they remain fair, effective and unbiased.

Using a credit scoring system helps our Group companies to lend responsibly. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using a credit scoring system.

## HOW WE USE CREDIT REFERENCE AGENCIES (MORTGAGES AND POLICY LOANS ONLY)

Credit Reference Agencies (CRAs) collect and maintain information about consumers' and businesses' credit behaviour. This includes Electoral Register, fraud prevention, and credit information – including details of previous applications and the conduct of your accounts – and public information such as County Court Judgements, decrees, and bankruptcies.

The information that Lloyds Banking Group companies and other organisations provide to credit reference agencies about you, your financial associates and your business (if you have one) may be provided to other organisations and used by them and us to:

- a) help make decisions, for example when:
  - i) checking details on applications for credit and credit-related or other facilities;
  - ii) managing credit and credit-related accounts or facilities;
  - iii) recovering debt;
  - iv) checking details on proposals and claims for all types of insurance;
  - v) checking details of job applicants and employees;
- b) detect and prevent crime, fraud and money laundering.
- c) check your credit history;
- d) verify your identity if you, or someone financially linked with you, applies for services;

- e) trace your whereabouts; and
- f) undertake research, statistical analysis and systems testing.

If a Lloyds Banking Group company needs to make a credit decision when you apply for a credit-based product or service (e.g. mortgage, personal loan, credit card, or current account) or to review the amount of credit it provides under an existing agreement, such as an overdraft, your records will be searched, along with those of anyone who is financially associated with you such as your spouse or partner. The CRA will keep a record of this search and place a "footprint" on your credit file, whether or not the application proceeds.

We may give details of your account and how you conduct it to credit reference agencies, including if you borrow and do not repay in full and on time. If you fall behind with your payments and a full payment or satisfactory proposals are not received within 28 days of a formal demand being issued, then a default notice may be recorded with the CRAs. Similar information may also be given about your other lending/ credit relationships with members of the group. Any records shared with CRAs will remain on file for six years after your account is closed, whether it has been settled by you or as a result of a default. Other organisations may see these searches and updates if you apply for credit in the future, and these may affect your ability to borrow from other lenders.

If you apply for or hold an account in joint names, or tell us that you have a spouse or financial associate, a financial association will be created between your records, including any previous and subsequent names used by you. This means that your financial affairs may be treated as affecting each other. These links will remain on your and their files until such time as you or your partner is successful in applying for a disassociation with the CRAs to break that link. You must be sure that you have their agreement to disclose information about them. Searches may be made on all joint applicants, and search footprints will be left on all applicants' records.

You have a right to apply to the credit reference agencies for a copy of your file.

We carry out most of our credit searches using Experian, but details of how you have run your account(s) may be disclosed to all the credit reference agencies. The information they hold may not be the same and there is a small fee that you may need to pay to each agency that you apply to. Their addresses are:

Experian Consumer Help Service, PO Box 9000, Nottingham NG80 7WP or call 0344 481 8000 or log on to <http://www.experian.co.uk/>

Equifax plc, Credit File Advice Centre, PO Box 1140, Bradford BD1 5US or log on to <http://www.myequifax.co.uk/>

CallCredit, Consumer Services Team, PO Box 491, Leeds LS3 1WZ or call 0870 060 1414 or log on to <http://www.callcredit.co.uk/>

## USING FRAUD PREVENTION AGENCIES

We have systems that protect our customers and ourselves against fraud and other crime. Customer information can be

used to prevent crime and trace those responsible. We will share your personal information from your application with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities
- Managing credit and credit related accounts or facilities
- Recovering debt
- Checking details on proposals and claims for all types of insurance
- Checking details of job applicants and employees.

Please contact us on **0345 845 0829** if you want to receive details of the relevant fraud prevention agencies. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

## HMRC (MORTGAGES ONLY)

In order to confirm the accuracy of the income information you have provided, we may share information about you and your application with HM Revenue & Customs ("HMRC"). HMRC will help us to validate whether income information provided to us is accurate. HMRC may also use the information provided to inform its risk profiling activities and to establish any mismatch with declared income.

## HOW WE CHECK YOUR IDENTITY

We may ask you to provide physical forms of identity verification when you open your account. Alternatively, we may search credit reference agency files in assessing your application. The agency also gives us other details and information from the Electoral Register to verify your identity.

The agency keeps a record of our search, whether or not your application proceeds. Our search is not seen or used by lenders to assess your ability to obtain credit.

## UNDERTAKING ANTI-MONEY LAUNDERING CHECKS (SAVINGS ONLY)

To comply with money laundering regulations, there are times when we need to confirm (or reconfirm) the name and address of our customers. This information may be shared with other group companies. For more details about identity checks, please refer to [www.moneyadvice.service.org.uk](http://www.moneyadvice.service.org.uk)

## OBTAINING INFORMATION ABOUT YOU, AND OTHER PERSONAL DETAILS (MORTGAGES ONLY)

When you apply for a mortgage or further borrowing it may be necessary to obtain references, details of your existing financial commitments, and any other information that is required to assess or review lending risks, to recover debts, and to prevent or detect fraud. Where applicable, your current and previous

employers, accountant, landlord, lender, bank, insurance or pension company may be contacted to obtain this information. In limited circumstances these references may need to be obtained after you open your account. This may be for regulatory purposes, or if the lending decision needs to be reviewed. Your permission to obtain these references will therefore continue to apply after your account has been opened. It may also be necessary to obtain information or documentation from your solicitor relating to any work they carry out either on your or our behalf.

## USING YOUR DETAILS FOR SERVICE CONTACT

Making sure we deliver excellent customer service is very important to us and to do this various methods of communication may be used when sending you information about your account. Most of the time you will be contacted by letter or telephone, but you may also be sent updates by text message or email when it is believed to be appropriate. You can ask us to stop sending these messages at any time. Additionally, in extraordinary circumstances (such as natural disaster or civil unrest) we may also send you updates by text message or email. If we decide to use email to contact you, we will only do this if we have ensured that using email will not put your information at risk, or, if you have requested we email you, that we have explained the risks of sending an "insecure" email and that you are happy to accept that risk.

In addition you may wish to choose a channel of communication that suits you when you need to contact us. If you need to email a Lloyds Banking Group company, we recommend you check their website to see if a secure email facility exists so that your email can be sent securely. If you send us emails in other ways, such as from your personal account, then remember that the message may not be secure and there is a risk that it could be intercepted. If you choose to send an "insecure" email, please keep the amount of confidential information you include to a minimum.

## RECORDING PHONE CALLS

We may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve our quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## USING INFORMATION ON SOCIAL NETWORKING SITES

As part of our ongoing commitment to understanding our customers better, we may research comments and opinions made public on social networking sites such as Twitter and Facebook.

## OBTAINING A COPY OF YOUR INFORMATION

Under the Data Protection Act you have the right of access to your personal data. The Act allows us to charge a fee of £10 for this service. If anything is inaccurate or incorrect, please let us know and we will correct it. For further details on how to request a copy of your information, please contact us on **0345 845 0829**.

## USING YOUR PERSONAL INFORMATION TO CONTACT YOU ABOUT PRODUCTS AND SERVICES

Lloyds Banking Group companies will use your personal information so we can provide you with product details and offers that are more relevant to you. This may include products and services from companies outside of our Group if we believe it may be of interest to you or benefit you financially, and it could continue after your relationship with us ends.

We might contact you by mail, telephone, email, or text message unless you have asked us not to. If you are an Internet Banking customer, we may also display personalised advertising to you when you use our Internet Banking service and mobile app, and through other digital channels (such as other websites or digital TV). You can change your preferences at any time by updating them online, calling us or writing to us. If you do opt out, you may still see some generic, non-personalised advertising when you are using other digital channels.

## PASSING YOUR INFORMATION TO OTHER COMPANIES FOR THEIR OWN DIRECT MARKETING

Unless you have given us your consent, we will not provide information about you to companies outside our group to use for their own marketing purposes.

## CONTACTING YOU ON YOUR PRODUCT MATURITY (SAVINGS ONLY)

To provide the best possible service, we will need to contact you shortly before the maturity of any fixed term or fixed rate products. This ensures that you can be made aware of the options available, and helps you make an informed decision about your maturity instructions.

## USING COOKIES

In general, you can visit Lloyds Banking Group websites without identifying who you are or revealing any information about yourself. However, cookies are used to store small amounts of information on your computer, which allows certain information from your web browser to be collected. Cookies are widely used on the internet and do not identify the individual using the computer, just the computer being used. Cookies and other similar technology make it easier for you to log on to and use our websites during future visits.

For more information on cookies, please view our [Cookies Notice](#).

## VIEWING NOTIFICATIONS

Organisations must lodge a notification with their Regulator describing the purposes for which they process personal information. The details are publicly available from the Regulator's office and you can view ours at [www.ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/](http://www.ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/)

## CHANGES TO PRIVACY NOTICE

We keep our privacy notice under regular review and we will reflect any updates within this notice. This privacy notice was last updated in July 2017.

### FURTHER INFORMATION

For further information please contact us on



0345 845 0829

Lines are open 8am to 6pm Monday to Friday (Wednesdays from 10am).

Copies of our literature can be provided in large print or in Braille and additional assistance is available to any customer upon request. If you have any special requirements please contact our customer service team on **0345 845 0829**.

Scottish Widows Bank is a trading name of Lloyds Bank plc. Registered office: 25 Gresham Street, London EC2V 7HN. Registered in England and Wales, no. 2065. Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under number 119278.

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