

# Privacy Policy

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## ABOUT US AND THIS POLICY

My Community Bank is a trading name of Brent Shrine Credit Union Ltd. Brent Shrine Credit Union Ltd is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Reference number 213245. Member of Association of British Credit Unions Limited.

Brent Shrine Credit Union is the Data Controller for the information you provide and we are registered with the Information Commissioners Office in the UK.

The purpose of this policy is to inform you how My Community Bank gathers and processes your personal information in accordance with this privacy policy and in compliance with the relevant data protection regulation and law. This document applies to visitors to our websites [www.mycommunitybank.co.uk](http://www.mycommunitybank.co.uk)

This policy provides you with information regarding your rights and obligations, and explains how, why and when we collect and process your personal data

We are committed to ensuring that your personal information is kept safe and we have put in place appropriate technical and organisational security measures to protect it.

We may update this notice at any time but if we do so, we will provide you with the link to the updated copy of this notice as soon as reasonably practical.

It is important that You read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about You.

If you have any questions or anything is unclear in this privacy policy, please contact us at [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk).

## DATA PROTECTION PRINCIPLES

We will comply with the relevant data protection legislation including the General Data Protection Regulation and the Data Protection Act 2018. We ensure that the personal information we hold about you is:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to You and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told You about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told You about.
- Kept securely.

## WHAT IS PERSONAL INFORMATION?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Personal Information may Include:

- personal details including your name, address, phone numbers, Caller ID, email address, date of birth, employment status and home ownership details;
- financial and banking information including account details and transactional information;
- demographic and lifestyle information;
- information collected from Credit and Fraud Prevention agencies at the point you first enquire about your loan and on an ongoing basis as we manage your loan;
- details of the loan(s) you hold and have held with us including all their transactions;
- details of any contact that we have had with you;
- details of how you applied for your loan (for example which browser you applied with);
- notes of any telephone, email or other communication with you; and
- information collected through customer feedback surveys.

In some circumstances we may also collect and process certain special categories of information. Special Category information includes information about your:

- race;
- ethnic origin;
- political opinions;
- religion or religious beliefs;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life or sexual orientation.

## WHAT INFORMATION WE HOLD AND PROCESS ABOUT YOU

We need to collect certain types of information to allow us to make a decision on your request for financial products. We also need to comply with Legal and Regulatory Requirements relating to Anti-Fraud, Anti-Money Laundering, Know Your Customer and Responsible Lending obligations. If you choose not to provide some or all of the information requested, we cannot make a decision whether to provide you with a product or service.

We will only collect the information we need to be able to provide you with the service you have requested. You need to make sure that the information you provide is accurate, complete and not misleading.

Your personal information may need to be disclosed when we are obliged to by law, for purposes of national security, taxation, defence of a legal claim or criminal investigations.

## HOW WE COLLECT INFORMATION ABOUT YOU

We collect information about you in a variety of ways including:

- Information submitted through our website or through our partner websites (including through any application forms which you complete on either our or our partner websites). This may include details such as your name, address, phone numbers, email address, date of birth and employment, banking and financial details;
- Your demographic and lifestyle information which you provide as part of the application process;
- Information which we receive from various third parties when making a decision about you, your loan, or application including information collected from Credit Reference Agencies, Fraud Prevention Agencies and other data providers;
- Information from any social network, or online account that you share with us.
- Information from organisations that have your consent, or a separate legal basis, to share data with us for a specific and defined purpose. This could include for direct marketing or assessing your eligibility for a partner's product; and
- from public sources, for instance the Companies House register, the insolvency register, the 'Open Register' which is an extract of the electoral register and search engine results.

## HOW WE USE YOUR INFORMATION

We may use your information only for the reasons you have provided it. As part of our financial services products we may need your information in order to be able to:

- process and complete your application for a loan or savings account;
- search Credit Reference Agencies' and Fraud Prevention Agencies' records;
- make an initial lending decision and to assess your eligibility for additional borrowing;
- set up and process payments and prevent fraudulent transactions;
- communicate effectively with you when applying for, agreeing to and undertaking the loan contract or deposit account, to effectively answer and manage any questions, concerns or complaints you may have;
- update our records and maintain your account with us;
- recommend offers for products and/or services that may be of interest to you;
- monitor, review and improve the content and appearance of our website, to ensure that content from our website is presented in the most effective manner for you;
- maintain and develop our business systems, including without limitation, testing and upgrading them;
- trace your whereabouts if we cannot contact you;
- recover any debt, you owe us;
- comply with our legal and regulatory requirements;
- use for any other specific purpose which we notify you of at the time your personal information is collected;

- pre-populate fields on our site to make it easier for you to navigate when you return to our website and login as an existing customer;
- issue tax documentation to investors.

We monitor emails and other forms of communications for its intended purposes only, such as for security, quality control and training.

If you provide us with any debit card or bank account details, either during the loan application or subsequently, we will keep those details and may use the details to take further payments both on your current loan and on any subsequent loans, unless you advise us otherwise.

We and other organisations may access and use information recorded by fraud prevention agencies from other countries for fraud prevention purposes.

### For Fraud Prevention:

- Search your record with credit reference and fraud prevention agencies to check and verify your identity (and the identity of any other individual named on your application) and collect your Credit Report (and any other individual named on your application). Credit reference agencies will keep a record of our enquiries, which may also be used by other organisations with access granted by the credit reference agencies. This may affect your ability to get credit. Please see section 12 for further details about how your personal data may be used by credit reference and fraud prevention agencies.
- Undertake appropriate checks to prevent or detect crime, money-laundering and or fraud.

### For Marketing, Communications and Advertising

Market and communicate our products and services we think these will be of interest to you. We use data that we collect to deliver and personalise our communications with you.

We may, for example, contact you by email or by other means of electronic communication to inform you about any news, events, new products, or services from My Community Bank.

You can always unsubscribe from receiving these emails if you want to by emailing us at: [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk)

### For our technical operations:

- to administer the website services, including processing any searches or requests for information about our products or services;
- to monitor, review and improve the content and appearance of our website, to ensure that content from our website is presented in the most effective manner for you;
- to maintain and develop our business systems, including testing and upgrading them;

### PRIMARY BASIS FOR PROCESSING YOUR PERSONAL DATA

In order to be able to use the personal information you provide us with

The primary authorisation for processing your special category data is your consent. As we are relying on your consent to process your special category data, you may withdraw your consent at any time by providing notice to us at: [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk)

However, if you do withdraw your consent, please note that we may be delayed or not able to continue providing you with our products or services (for example, we will not be able to continue assessing your application for a loan).

### Why Do We Process Your Personal Information?

We will only collect and use your personal information where it is necessary for us to carry out our lawful business activities. Our grounds for processing your data are as follows

### Contractual Obligations

We may process your information where it is necessary to enter into a contract with you or to perform our obligations under that contract. This may include processing to:

- Assess your eligibility for the products and services we provide, and
- Provide and administer the products we offer, including:
  - setting up your account;
  - verifying your contact information;
  - collecting and issuing necessary information and documentation;
  - processing payments and disbursing money;
  - issuing statements, formal notices;
  - to manage fees, charges and interest due on your account;
  - to send service communications and statutory notices;
  - to collect and recover outstanding sums owed to us; and
  - to address any enquiries or complaints we receive from you or a representative you have appointed.
  - to issue tax documentation to our investors

## Legal obligation

We may process your data where it is a legal or statutory obligation. This may include processing to:

- confirm your identity;
- detect, investigate and report transactions in order to comply with laws relating to money laundering, financial crime and international sanctions;
- assess affordability of any credit products for which you apply;
- detecting, investigating and reporting financial crime, and taking measures to prevent this;
- maintain records of our business as required by law, e.g. creating and keeping record of company accounts;
- complying with laws which require us to provide information, directly or indirectly to any national authority, for the purpose of calculating and collection of tax;
- responding to enquiries and requests for information by any of our Regulators;
- creating and submitting reports required by any of our Regulators;
- to otherwise meet our obligations under all laws and regulations based on law which apply to our business activities; and
- where we have a duty to protect vulnerable customers.

## Legitimate interest

We may process your information when we have a business or commercial reason to do so. If we do, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is. This may include processing to:

- develop new products and services;
- statistical analysis, analytics and profiling, for example, to create scorecards, models and variables in connection with the assessment of credit, fraud, risk or to verify identities, to monitor and predict market trends, and for analysis such as loss forecasting;
- monitor, review and improve the content and appearance of our website, to ensure that content from our website is presented in the most effective manner for you assess how our customers use our website, products and services;
- maintain and develop our business systems, including without limitation, testing and upgrading them;
- assess your eligibility for Top Up loans; and
- to obtain finance for the products we provide.
- Send email marketing for new rates, new products and services.

## The Legal Basis For Processing Other Forms Of Your Personal Data Is:

it is necessary for the performance of a contract between you and us (i.e. for us to consider, process and deal with your application and provide you with the requested services).

Your provision of personal data to us is a contractual requirement. If you do not supply your personal data to us, it may delay or prevent us from providing you with our products or services (for example, we will not be able to review and assess your application for one of our products).

it is necessary for the purposes of the legitimate interests pursued by us (for example, operating and making available the website and providing you with information about our products and services).

Please refer to the full privacy statements in section 12 for further details about how we will or may use your personal data.

## INFORMATION WE SHARE

There are certain circumstances where we may transfer your personal data to contractors and to other third parties.

When we need to share your information, we always take care to ensure its security. We have written contracts with our contractors and suppliers and they are required to meet our standards on processing information and security. The information we provide to them, will only be used in connection with the performance of their function.

We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

## Your Personal Information May Be Transferred To Other Third-Party Organisations In Certain Scenarios:

- firms and businesses that help us provide you with the right product and services.
  - Credit Reference Agencies such as Call Credit (Currently TransUnion LLC), Experian or Equifax and fraud prevention agencies such as CIFAS.
- any organisation which supports our business or any of our products that you have applied for. e.g. our IT partners such as Gojoko Marketing Ltd, Amplifi, Mambu and Persistent Systems. we adhere to the principles of Open Banking
- communications service providers offering mail, email and SMS text services;
- Debt Collection Agencies and Debt Management Companies;
- customer survey providers in order to receive feedback and improve our services;
- legal services;
- digital marketing service providers;



- direct marketing service providers;
- payment processors; governmental, regulatory or other appropriate authorities (including authorities outside of the UK) if we identify or suspect suspicious or criminal activity (for example if we know or suspect that a transaction involves money laundering). We may not be able to inform you that a disclosure has been made or the reasons for it.
- Third Parties who you give us explicit permission to share your personal data with;
- applicable third parties, if we must disclose your personal data to comply with the law, or to enforce our Terms and Conditions or other agreements; or to protect the rights, property or safety of us, our customers, or others.
- If we are required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority - for example the Police or FCA & PRA.
- debt and equity investors who help us finance the products we provide.
- We use GoCardless to process your Direct Debit payments. More information on how GoCardless processes your personal data and your data protection rights, including your right to object, is available at <https://gocardless.com/legal/privacy/>

### How Do Credit Reference And Fraud Prevention Agencies Use Your Data?

When you apply to us for a loan, we will check the following records about you (and others where applicable):

- Any records we may already have about you;
- those held by Credit Reference Agencies ("CRAs"); and
- those held by Fraud Prevention Agencies ("FPAs").

CRAs supply us with public information (including from the electoral register, county court judgements and bankruptcies registers) and shared credit and fraud prevention information, including information about previous applications and the conduct of accounts in your and your financial associate(s)' name(s).

You should be aware that whether or not your loan or savings application is successful, when CRAs receive a search from us they will place a soft search footprint on your credit file that may be seen by other lenders. Large numbers of applications within a short time period may affect your ability to obtain credit. This is applicable whether your application is accepted or declined.

We will send the information that you submit through our website to CRAs. This information will be recorded by them. We and other organisations may access and use this information to prevent fraud and money laundering and CRAs and FPAs may use your information for statistical analysis. Information held by CRAs and FPAs will be disclosed to us and to other organisations in order to (for example):

- prevent fraud and money laundering and to check and assess applications for credit, credit related facilities or other facilities;

- recover debts that you owe and trace your whereabouts;
- manage credit accounts and other facilities and decide appropriate credit limits;
- verify your identity;
- make decisions on credit and other facilities for you or your business;
- check details on proposals and claims for all types of insurance; and
- check details of job applicants and employees.

When you borrow from us, we will give details of your loan and how you manage it to the CRAs. If you borrow and do not repay in full and on time, the CRAs will record the outstanding debt and, in some cases, the length of time that the debt remains outstanding. Other organisations may see these updates and this may affect your ability to obtain credit in the future.

If you fall behind with your payments and a full payment or satisfactory proposal is not received within 14 Days of a “Notice of Default” being issued then a “Formal Demand” will be issued and a default registered on your Credit File with CRA’s.

This information may be supplied to other organisations by CRAs and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe.

If you give us false or inaccurate information and we have reasonable grounds to suspect fraud or we identify fraud we may record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention including law enforcement agencies who may then access this information.

The Credit Reference Agency that we use is TransUnion LLC (formally Call Credit Information Group Ltd).

The Fraud Prevention Agencies that we use are TransUnion LLC (formally Call Credit Information Group Ltd) and CIFAS.

<https://www.transunion.co.uk/legal-information/bureau-privacy-notice>

If you have any further questions about our use of Credit Reference Agencies or Fraud Prevention Agencies (or would like to receive details of these agencies) please email us at friends@mycommunitybank.co.uk or call us on 0203 375 0221.

### How Do We Work With Fraud Prevention Agencies?

We undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity before we make a decision about your application. These checks require us to process personal information about you.

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

We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to

comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

## Consequences Of Processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

## WHAT COOKIES AND OTHER TECHNOLOGIES DO WE USE?

We may use cookie technology on our website to collect some of the information detailed in this policy.

Cookies are small text files stored on your device or internet browser when you visit us. We use cookies mainly to improve the performance of the My Community Bank website and our service for customers.

Our Cookie Policy explains in more detail what types of cookie we use, why we use them and how to identify and disable them, but please be aware that some of our services will not function as smoothly if your browser disables all cookies.

When a visitor requests any page from our web site, our web servers automatically obtain that visitor's domain name and IP address. This information does not contain sensitive data about our users and is critical to the functioning of all websites. An IP address serves as the return address, much like a post code, of your device when you request to see a webpage which allows us to send the information you want back to you. We only use this data to investigate and prevent fraud or abuse of our website.

This site uses the web analytics service that can record user clicks, movements, scrolling and selected non-personal text users enter into our website. The service does not gather personally identifiable information. We use this service to improve our website, make it more user-friendly and monitor that everything is performing as well as possible.

As part of our commitment towards transparency and customer data privacy, we need to ask for your consent to set the marketing cookies described in our cookie policy. When you arrive on our website you will be asked for your consent to place these cookies on your device, stating that if you continue to use our website you consent to the placing of such cookies.

If you, or another user of your computer, wish to withdraw your consent at any time, you can do so by altering your browser settings or navigating to our Cookie Policy.

## What We Will Not Do

We won't share identifiable personal data with third parties for their direct marketing.

## SECURITY

We are committed to keeping your personal information safe. We have put in place physical, technical and administrative measures to prevent unauthorised access or use of your information.

## INTERNATIONAL TRANSFERS

We may transfer your personal data outside the European Economic Area ("EEA"). Your personal data may therefore be processed by partners outside the EEA who work for us or one of our suppliers.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is adhered to it by ensuring at least one of the following safeguards is implemented:

Subject to the following paragraphs, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en))

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Where we share data with fraud and crime prevention agencies and fraud and/or criminal history checking service providers in the EEA, they may transfer your data outside of the EEA, in this case they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the EEA and/or they may require the recipient to subscribe to certain standards, intended to enable secure data sharing.

Please contact us at [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk). if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## How Can You Amend Your Marketing Preferences?

Any electronic marketing communications we send you will include clear and concise instructions to follow should you wish to unsubscribe. You may also amend your contact preferences in the following ways:

- by logging into your online account and amending details there;
- by emailing us at [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk), and
- by calling us on +44(0) 203 375 0221.

## YOUR RIGHTS

You have certain rights in relation to your information including a right to access or to correct the information we hold on you. We have listed the rights you have over your information and how you can use them below.

These rights may only apply in certain circumstances and may be limited if there are outstanding contracts between us, if we are required by law to keep the information or if the information is relevant to a legal dispute.

- You can remove consent, where you have provided it, at any time. Although this may have an impact on our ability to provide you with financial products.
- You can ask us to confirm if we are processing your information.
- You can ask for a copy of the information we hold about you.
- You can ask us to correct your information if it is wrong.
- You can ask us to restrict how we use your information.
- You can ask us to help you move your information to other companies. To help with that, you have a right to ask that we provide your information in an easily readable format to another company.
- You can ask us to stop using your personal information, but only in certain cases.
- 
- You have the right to obtain and reuse your personal data for your own purposes across different services ("portability");
- You have the rights related to automated decision-making including profiling.

To request any of these rights please contact us by emailing at [friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk) or to exercise any of the rights verbally you can call +44(0) 203 375 0221. Please note that there may be circumstances under which we do not have to, or cannot comply with, these requests.

You also have the right to complain to the Information Commissioner's Office about the manner in which we process your personal data.

## How do we use automated decision making?

We may use your personal information in automated processes to make decisions about you. You have the right not to be subject to a decision based on solely automated processing, if this will have a legal or other significant effect on you (certain exceptions apply).

We use automated decision making in:

- credit scoring and affordability assessment. We use data collected from yourself through online forms, your usage of our site and Credit Reference Agencies and other 3rd parties to assess your creditworthiness and affordability of the product applied for. You have the right to appeal the outcome of these automated decisions;
- fraud and money laundering risk identification. We may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity
- we may use your personal data in profiling to identify whether you are suitable for products and services we offer and to inform you of these. This profiling will be conducted by ourselves when assessing suitability of existing customer for top up offers. We will use profiling in conjunction with our partners when developing new prospect marketing campaigns.

## Data retention

How long will you use my information for?

Your personal data will be stored for as long as you are a customer with us. We will keep your personal data for 7 years after you stop being a customer with us, for the following reasons:

- to respond to any query or complain you may have; and/or
- to fulfil our legal record keeping obligations.

After this retention period, we'll then delete your personal data securely and safely.

## How do we link to other sites?

Our website may contain hyperlinks to websites that are not operated by us. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal information about yourself.

## How To Find Out More:

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all.

TransUnion LLC (formally Call Credit Information Group Ltd), Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 060 1414

Membership Team

My Community Bank

The Emerson Building,

4-8 Emerson Street

London

SE1 9DU

+44(0) 203 375 0221

[friends@mycommunitybank.co.uk](mailto:friends@mycommunitybank.co.uk)

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