

## **PRIVACY NOTICE**

This notice is to let you know how we will use your personal information (also referred to as “personal data”) when you access our Balance my Bills online tool (“**BmB**”). It also explains your privacy rights and how the law protects you.

### Who we are

Any personal data provided to, or collected by, the BmB tool is controlled by both Bradford and Bingley plc (“**B&B**”) and NRAM Limited (“**NRAM**”), which are together the data controllers in respect of that data. When we mention “we” or “us” in this privacy notice, we are referring to both B&B and NRAM.

This notice applies to you because you have accessed BmB in order to access an online budgeting tool to enable you to review your income and expenditure and compare your monthly spending against that of similar households. You may be using BmB because you have a mortgage or loan with us and we have made you aware of it. However, BmB is also available to other individuals (those who are not our customers), and therefore this privacy notice applies to non-customers in the same way as it does to our customers.

B&B and NRAM are authorised and regulated by the Financial Conduct Authority.

Our Data Protection Officers can be contacted by writing to either: The Data Protection Officer, NRAM or the Data Protection Officer, Bradford & Bingley, both at Croft Road, Crossflatts, Bingley, West Yorkshire, BD16 2UA.

### The wider UKAR group

NRAM and B&B are both part of the wider UK Asset Resolution group of companies (the “**UKAR Group**”), and your data may be shared with the group parent company, UK Asset Resolution Limited, and/or with other group companies as required so that we can deliver our services to you and manage our business effectively.

### Our mortgage service provider

In providing BmB to you, we work closely with the UKAR Group’s mortgage service provider, Computershare Mortgage Services Limited (“**CMS**”). This means that from time to time, we will share your personal data with CMS who, in turn, may share the information with other Computershare group companies which assist CMS in delivering services.

From time to time, CMS will also share your information with other third party companies, including a company called Investis Limited (“**Investis**”) which operates BmB and accordingly assists us in providing it to you.

All data sharing with CMS and Investis is subject to strict confidentiality requirements.

### The kinds of personal information we use

To use BmB, you must input different kinds of information about yourself into the tool. This information includes:

We use the following different kinds of personal information about you:

- personal information such as your full name, and e-mail address;
- passwords relating to your BmB account;
- information relating to your household such as the number of occupants, the number of your dependants, the type of property and the number of bedrooms;
- financial information relating to your income, including your basic income and/or additional income such as overtime or bonuses as well as any benefits that you may be in receipt of;
- financial information relating to the income of other individuals living with you, including their basic income, additional income and any benefits they may be in receipt of;
- other financial information such as your mortgage payments, and any personal loans and/or store cards, life assurance and pension schemes, savings and investments that you may have; and
- information relating to your expenses such as your household bills, living costs such as healthcare or mobile phone subscriptions, travel and leisure expenses as well as any childcare or pet care costs that you may have.

### Where we obtain your data

Much of the personal data we collect as a result of you visiting BmB, will come directly from you entering your details on the site. We will also sometimes derive additional data through analysis of that information.

### How we use your data

We may use your personal information in the following ways:

- to help you review your income and expenditure, compare your monthly spending against that of similar households, and if necessary, create a budget plan;
- for the purposes of saving your budget plan so that you are able to return to and update your information in future;
- for the purpose of registering you on BmB so that you are able to log-in review and/or change your saved information in future;
- to enable you to carry out a password reset in relation to your BmB account;
- to manage our business in an efficient and proper manner; and
- to generate monthly reports solely for internal use to assist us in undertaking statistical analysis and monitoring volumes with the aim of improving our services and/or identifying any trends.

### How the law protects you

The Regulation says that we may only use your personal data where we have one or more legitimate reasons (or grounds) for doing so. The grounds on which we use your data are as follows:

- **because you have explicitly consented to a specific use of your data.** This applies in relation to the way in which we use and store your data to create a summary of your financial position;
- **because it is necessary to comply with a legal obligation.** This applies to circumstances where we disclose your information to a public body, such as the police, that is empowered to demand that we provide it; and
- **because it is necessary for the purposes of our own legitimate interests.** This applies to many of the ways in which we use your data. It also applies to ‘higher level’ activities such as undertaking reviews, analysis and reports, which are undertaken as part of the our legitimate interest in arranging the sound internal management and governance of our business. It also applies to circumstances where we disclose your data to:
  - a third party such as a regulator because we need to do so to defend our rights or standing; a company (including CMS and Investis) to whom we have either indirectly or directly outsourced the delivery of some or all of our services (in accordance with our legitimate interest in managing our business efficiently);
  - our auditors/accountants and other parties which provide a service to us; and
  - UK Government Investments Limited (“**UKGI**”), the company which looks after the UK government’s ownership of the UKAR Group.

### Third parties with whom we share your data

We may share your data with following recipients:

- companies to whom we outsource the delivery of some or all of our services (including CMS and companies to whom CMS outsources delivery of services (including Investis));
- UKGI (as detailed above);
- law enforcement agencies where fraud is suspected;
- regulators (such as the Financial Conduct Authority and the Information Commissioner) where they have asked for information or it is reasonable for us to provide it in defence of our position; and
- our auditors/accountants and other professional services firms which we may engage to undertake work for us (on the basis that they keep your personal data confidential).

### Transfers outside of the European Economic Area (‘EEA’)

From time to time we may outsource the delivery of some services to companies outside of the EEA and your personal data may be accessible to them. To address the risks which this presents, the relevant recipients are (or, for future transfers of data, will be) placed under strict contractual duties regarding the confidentiality of all customer information, meaning they are obliged to ensure that all personal data is processed in the same way as if it was being processed inside the EEA.

### Retention periods

You can delete your account at any time. However, in accordance with our data protection obligations, we are under a responsibility not to retain data longer than it is necessary. Therefore if your account has been inactive for longer than two years we will take steps to delete it. Please note that this will result in all your data being removed from the Investis system.

### Your rights

Subject to any overriding legal obligations, requirements and/or exemptions, you have the right to:

- object to our processing of your personal data where it is based exclusively on our legitimate interests (see above);
- ask us to correct incorrect personal data which we may hold about you;
- request the erasure of personal data where it is no longer necessary for the purpose(s) for which it was originally collected; and
- obtain a copy of your personal data.

Please note that you are able to view, correct or delete most of your personal data by logging in to your BmB account and carrying out the appropriate actions. Alternatively, you can submit a request to us by writing to either: The Data Protection Officer, NRAM or The Data Protection Officer, Bradford & Bingley, both at Croft Road, Crossflatts, Bingley, West Yorkshire, BD16 2UA with details of your request. Please note that we will ask you to provide a form of identification verification before we can give effect to any such request made by you.

### How to make a complaint

Wherever possible, if you have a complaint about our data processing activities, we would like to work with you to resolve this. If you have a complaint please contact either of the Data Protection Officers as detailed above.

You may also make a complaint about our data processing activities to a supervisory authority. For the UK, this is the Information Commissioner's Office, at [ico.org.uk](https://ico.org.uk).