ACCORD MORTGAGES

HOW WE USE YOUR PERSONAL INFORMATION

ACCORD MORTGAGES PRIVACY NOTICE

For large print, braille or audio communications please visit us in branch or call us on **0345 1200 891**.

Registered Office: Yorkshire House, Yorkshire Drive, Bradford BD5 8LJ.

Accord Mortgages Limited is authorised and regulated by the Financial Conduct Authority. Accord Mortgages Limited is entered in the Financial Services Register under registration number 305936. Buy to Let mortgages for business purposes are not regulated by the Financial Conduct Authority. Accord Mortgages Limited is registered in England No: 2139881.

Accord Mortgages is a registered Trade Mark of Accord Mortgages Limited.
All communications with us may be monitored / recorded to improve the quality of our service and for your protection and security. Calls to 0800 numbers are free of charge from a landline or a mobile. Calls to 03 numbers are charged at the same standard network rate as 01 or 02 landline numbers, even when calling from a mobile.

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This privacy notice explains

- Who we are
- How we collect, share and use your personal information
- How you can exercise your privacy rights.

We are Accord Mortgages Limited ("Accord"). Wherever you see "we", "us" or "our" in this privacy notice it means Accord Mortgages Limited ("Accord").

Accord is a dedicated intermediary only subsidiary of Yorkshire Building Society (YBS). For certain processing activities required to provide Accord's services (including the use of systems to facilitate Accord's services), we will be a joint controller with YBS of your personal information. For other activities, YBS may be a processor, acting on Accord's behalf.

EU representative

To comply with the General Data Protection Regulation (2016/679), if you are in the European Union, we have appointed a European representative.

If you wish to contact them, their details are as follows:

Bird & Bird GDPR Representative Services SRL
Avenue Louise 235
1050 Bruxelles
Belgium

EUrepresentative: YBS@twobirds.com

Key contact: Vincent Rezzouk-Hammachi

Personal information we collect from you

We collect your personal information when you:

- Register as a broker
- Apply for our products or services through a broker, online, by post or on the phone
- Update your information online, in a YBS branch, agency or over the phone (such as when you change your address)
- Visit a YBS branch
- Speak to us on the phone
- Visit our website, use our online web chat services and any digital or mobile app we may offer now or in the future
- Send us letters, emails or other documents.

Personal information we collect from you: continued

The types of personal information we collect from you are:

- **Identity details** which includes your full name, title, date of birth and age, account number
- **Contact details** which includes your home address, email address and phone number
- **Personal data** about your family which includes your marital status, parent's full names, next of kin and dependents, emergency contact
- **Financial data** which includes your earnings, income, expenditure, spending habits, transaction history, and source of funds
- **Broker data** company details, job title, FCA number
- **Identification data** which includes your driving licence, passport, National Insurance number and other national identifiers
- **Profile data** about you which includes your nationality, citizenship status, sex, occupation, employment status, employment details, residential status, property details and occupancy status, benefits and entitlement data, insurance information, social media account and history
- **How you interact with us** which includes call recordings, photographs, video recordings or any other form of communication
- **Technical details** which includes internet protocol (IP) address, location data, operating system, device details, time zone, browsing time, web history, cookie information, network interaction history, routing number etc.

We also collect special categories of personal data, including:

- **Health data** which includes any physical disability, mental disability or any medical condition
- **Criminal data** which includes information about criminal convictions and offences, allegations (proven or unproven) and investigations, penalties and restrictions, county court judgments and insolvency details as well as information relating to the absence of convictions.

It is important that the personal information we hold about you is accurate and up to date.

Please keep us informed of any changes to your personal information, such as change of contact details etc. When you provide personal information about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we process their personal information.

We also collect information from public sources as part of our investigations and due diligence checks.

Personal information we collect from others

Sometimes we work with carefully selected third parties and we may receive your personal information from them.

The third parties include:

- Business partners
- Suppliers
- Sub-contractors
- Advertisers
- Referrers
- Fraud prevention agencies such as CIFAS and National Hunter – You can learn more about how your personal information is used here cifas.org.uk/fpn or nhunter.co.uk/privacy-policy/
- Credit Reference Agencies (CRAs) are used to perform credit, identity and fraud prevention checks against public (electoral register) and shared credit information (You can learn more about how your personal information is used here: Credit Reference Agency Information Notice (CRAIN) | Equifax UK)
- Public sources (such as the electoral register, Companies House etc).

We may obtain personal information relating to you from other individuals as part of the application process for one of our products or services. This can include individuals who are:

- A joint applicant on an account you hold or are applying for
- A trustee on an account
- A parent
- A guardian
- A nominated representative
- Acting under a Power of Attorney or similar authority
- A mortgage broker who is acting on your behalf.

If someone acting on your behalf provides this information, we'll record what's been provided and who gave it to us.

When you provide personal information about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we process their personal information.

We also collect information from public sources as part of our investigations and due diligence checks.

How we use your personal information

Purpose/Activity	Types of personal information	Legal basis for processing your information
Registering as a Broker with us	• Identity data • Contact data • Broker data	Necessary for the performance of a contract
Processing an application for a product of service with us	• Identity data • Contact data • Financial data • Profile data • Family data • Identification documents • Broker data	Necessary for the performance of a contract
Managing and administering your account with us	• Identity data • Contact data • Financial data • Profile data • Family data • Identification documents • Broker data	Necessary for the performance of a contract
Competitions, gifts and rewards, prize draws, interactive features and sending birthday greetings	• Identity data • Contact data	Consent Legitimate interests
To manage your attendance and participation in events and promotional activities.	• Identity data • Contact Data • Photographs and video recordings	Consent Legitimate interests
Paying broker's commission	• Broker data • Financial data	Necessary for the performance of a contract
Preventing and investigating fraud	• Identity data • Contact data • Financial data • Profile data • Family data • Identification documents • Broker data	Legal obligation
Developing and improving our processes, systems and policies	• Identity data • Contact data • Financial data • Profile data • Family data • Identification documents	Our legitimate interest
Conducting surveys to understand your experience and interactions with Accord	• Identity data • Contact data • Broker data	Our legitimate interest
Collecting IP address when using our web site to detect suspicious activities	• Technical data	Our legitimate interest
Developing our business and understanding how we're performing	• Identity data • Contact data • Financial data • Profile data • Family data • Broker data	Our legitimate interest
Sharing relevant marketing about products and services	• Contact data • Broker data	Consent provided by the individual
Managing queries and complaints raised by you	• Identity data • Contact data • Financial data • Profile data	Our legitimate interest
Meeting our legal and regulatory obligations	• Identity data • Contact data • Financial data • Profile data • Family data • Broker data	Legal obligations
Responding to feedback	• Identity data • Contact data	Our legitimate interest
Whistleblowing processing	• Identity data • Contact data • Profile data	Legal obligation

How we use your personal information: continued

Auditing and assuring our processes, products and services	• Identity data • Contact data • Financial data • Profile data • Family data • Identification documents • Broker data	Our legitimate interest
Testing our systems and processes	• Identity data • Contact data • Financial data • Profile data	Our legitimate interest
KLP Voting emails / conference Invites	• Identity data • Contact data	Our legitimate interest

Where we are processing your personal information for our legitimate interests, you may object to the processing of your personal information.

If you have provided your consent to us for processing your personal information, you may withdraw the consent that you have provided at any time.

We also collect Special Categories of Data for the following purposes:

Purpose/Activity	Special category of personal data collected	Legal basis	Additional legal basis
Preventing and investigating fraud	Criminal data	Legal obligation	Substantial Public Interest (Preventing fraud)
Managing Anti-money Laundering requirements	Criminal data	Legal obligation	Substantial Public Interest (Suspicion of terrorist financing or money laundering)
To assess and accommodate our service to meet vulnerable customer needs	Health data	Consent provided by the individual Legitmate interests	Explicit consent
My Voice Community	Sensitive data	Consent provided by the individual	Explicit consent

Artificial intelligence: how we use it to support you

We want you to know how we use technology to help you. Sometimes, we, or our carefully selected suppliers, use artificial intelligence (AI), including generative AI. We use AI to help our colleagues work more efficiently, improve customer service, support decision making, help identify potential fraud, improve quality monitoring and help us communicate more effectively with our customers.

Depending on the service being provided, AI may process information you give us, information generated through your interactions with us and information we already hold about your accounts, products and services.

What Is AI?

AI systems are computer programs that process information and produce outputs such as:

- Predictions
- Content
- Recommendations
- Decisions

Examples of where we use AI may include but are not limited to:

- Summarising telephone conversations we have with you
- Summarising letters we receive from you
- Drafting letters or e-mails that we send to you
- Summarising information you provide, for example information in relation to mortgage affordability to assist our decision making and support our underwriting processes
- To monitor for fraud.

As our use of AI develops, we may introduce new AI enabled services and processes and will update this privacy notice as appropriate.

How We Protect Your Personal Data

We use AI in a safe and responsible way using only the minimum personal data needed for our purposes . This means we design and operate AI systems to be secure, transparent, and fair, with appropriate human oversight. Where we use external AI providers, we ensure appropriate contractual and technical controls are in place.

Our use of AI follows applicable regulatory principles, industry standards, and is overseen through our internal governance processes to make sure your personal information is processed securely.

Keeping Things Fair and Accurate

Although AI may assist us in carrying out assessments and supporting decision making, no decisions are made solely by AI. Appropriately trained colleagues review AI generated outputs and remain responsible for any final decisions. We use human oversight to help ensure that outcomes are fair, accurate and consistent.

Sharing your personal information

When necessary, we share your personal information with:

- Service providers
- Tax, government, and any relevant regulatory authorities
- Prosecuting authorities and courts, and/or other relevant third parties connected with legal proceedings or claims
- Fraud prevention and/or law enforcement agencies
- Fraud Prevention Agencies such as CIFAS and National Hunter – you can learn more about how your personal information is used here cifas.org.uk/fpn or nhunter.co.uk/privacy-policy/ 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
- Your shared ownership scheme provider
- Third parties where you have asked us to share your information
- Third parties where it's necessary to enter into or necessary for the performance of a contract
- Third parties where we are required to do so by law
- Credit reference agencies are used to perform credit, identity and fraud prevention checks against public (electoral register) and shared credit information at application stage and while you continue to have a relationship with us.
- Joint account holders, including former, current and/or future account holders
- Third party legal representatives in the instance of a joint mortgage application.

We share your personal information with Yorkshire Building Society (YBS). All companies we work with are assessed for adequacy of their security controls, so you know your personal data is safe.

Transfer of your personal information outside the united kingdom

Your personal information may be transferred or stored in locations outside of the UK.
We will only transfer your data when:

- We're required or permitted to by law or regulatory requirements
- We're sharing data with a third party to support us in the management of your account.

When transferring data, we make sure that suitable protection is always maintained by ensuring appropriate safeguards are in place. This could be by:

- Ensuring that we transfer personal data to countries that the Information Commissioner (ICO) has deemed to provide an adequate level of protection
- Putting suitable clauses in our contracts so that organisations take appropriate steps to give personal data the same protection it has in the UK

If you would like more information on this, please feel free to contact us by using the details provided in this notice.

Keeping your personal information

We keep personal information for as long as it is required by us:

- For the purposes described in 'How We Use Personal Information' section above
- To meet our legal or regulatory obligations
- For the exercise and/or defence of any legal claims.

When determining retention periods, we consider the following:

- The maximum or minimum retention periods identified by the law or regulatory guidance
- Our contractual rights and obligations
- Customer expectations, the nature of your relationship with us, your membership status and the types of accounts, products and services you have with us
- Current or future operational requirements
- Forensic requirements, for example, the potential need to access data no longer actively used in order to manage or respond to complaints and disputes
- The risks involved in retention, deletion and removal
- The cost of maintaining, storing, archiving and retrieving data
- The capability or restraints of our systems and technology.

If you would like more information on this, please feel free to contact us by using the details provided in this notice.

Profiling

There may be some circumstances where we use your personal information for profiling (processing of personal information to evaluate certain things about you).

For example, to ensure that we're providing a consistent service and giving people the best products and advice at the right times.

We'll always make sure the way we process your information is safe and not unfair to you.

Where possible, we'll keep your details anonymous and use your information only to produce statistical reports. This way, you will not be identifiable from the data.

You have the right to object to us using your personal information for profiling activities. Please refer to the Subject rights section for more information.

Automated decision making

There may be circumstances where we use automated decision making using your personal information.

We use automated decision making to check that we can enter into an agreement with you, and also carry out our legal and regulatory obligations (e.g. when complying with UK money laundering regulations).
You have certain rights over your personal information when using automated decision making. If you would like more information on this, please see the 'Your data subject rights and how to exercise them' section below.

Your data subject rights and how to exercise them

You have rights relating to the personal information we hold about you, however, they may be subject to various exceptions and limitations.

You can request to exercise your rights at any time by contacting us using the details in this privacy notice.

Right to be informed: We are obliged to provide clear and transparent information about our processing activities of your personal information.

Right to request access to your personal information (commonly known as a 'data subject access request'): You have the right to understand what personal information we hold about you and why.

Right to request correction of your personal information: If you believe that we hold inaccurate or incomplete personal information, you have the right to request us to rectify or correct your personal information.

Right to request erasure of your personal information: You may ask us to delete or remove personal information where there is no good reason for us to continue to process it. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons.

Right to request restriction of processing of your personal information: You may ask us to stop processing your personal information. We will still hold the data but will not process it any further. You may exercise the right to restrict processing when one of the following conditions applies:

- The accuracy of the personal information is contested
- Processing of the personal information is unlawful
- We no longer need the personal information for processing, but the personal information is required for part of a legal process
- The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

Right to data portability: You may request your personal information be transferred to another controller or processor, provided it is in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means, and if the processing is based on the fulfilment of a contractual obligation.

Right to withdraw consent: You may withdraw consent at any time if we are relying on your consent to process your personal information. This won't affect any processing already carried out before you withdraw your consent or processing under other grounds.

Right to object: You have the right to object to our processing of your personal information where:

- Processing is based on legitimate interest
- Processing is for the purpose of direct marketing.

We may need specific information from you to help us confirm your identity before we can review your request.

The simplest and quickest way to request this information is by completing our simple online request form.

Alternatively, you can write to us at the address below:

Data Subject Request
Yorkshire House
Yorkshire Drive
Bradford
West Yorkshire, BD5 8LJ

Making a data protection complaint

If you have any concerns about the use of your personal information or the way we handle your requests relating to your rights, you can raise a complaint directly with us by using the contact details provided in this notice.

If you are not satisfied with the way we handle your complaint, you are entitled to raise a complaint directly with the UK Information Commissioner's Office via the details available on their website: www.ico.org.uk.

Data protection officer

If you have any questions about:

- This privacy notice
- The use of your personal information, or
- Wish to request to exercise any of your rights

Please contact our Data Protection Officer using the following details:

By email: dpo@ybs.co.uk

By post: Data Protection Officer
Yorkshire House,
Yorkshire Drive,
Bradford,
West Yorkshire, BD5 8LJ