

HOW WE USE YOUR PERSONAL INFORMATION





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Introduction

Accord Mortgages Limited is a dedicated intermediary only subsidiary of Yorkshire Building Society. Accord Mortgages is a registered trademark of Accord Mortgages Limited.

Accord Mortgages Limited decides what personal information we need to collect, why we need it, how we use it, where we may obtain further personal information from, who we share it with and how long we keep it. This makes us the data controller of your personal information for data protection purposes.

References to 'YBS Group' or 'Yorkshire Group' refer to Yorkshire Building Society, (Accord's parent) and the trading names under which it operates (Chelsea Building Society, the Chelsea and its subsidiary companies).

This booklet explains what personal information Accord Mortgages collects about you and how we use it.

What personal information do we collect?

Personal information is any information that can be used to identify you or another living individual either on its own or together with other information available to us. We collect personal information to offer our products and services and to deal with you as a customer. The types of personal information we require varies depending on the product or service you have applied for. Below we have set out the personal information we require from you when making an enquiry with us or taking out a product or service with us.

When you make a general enquiry we will collect:

- Full name (e.g. title, first name, other names, family name)
- Address and contact details (e.g. home and correspondence address, home and mobile telephone numbers, email address).

We require your full name, address and contact details for all products and services. We may also need additional personal information for certain products. This is explained below.

For Mortgages, Offset Savings and Insurance products we collect:

- Historical address(es) and contact details (e.g. previous home and correspondence address, home/mobile telephone numbers and email address)
- Date of birth and/or age
- National identifiers (e.g. National Insurance number)
- Marital status, family, lifestyle, social circumstances (e.g. single, married, civil partnership, divorced, widowed, number of dependants, interests, hobbies)
- Nationality (where required to comply with legal and regulatory requirements)
- Communication records and how you have contacted us (e.g. online, e-mail, call recordings, letters)
- Location data (e.g. IP address, mobile phone tracking)
- Social Media activity/posts (accessed and posted by you and/or others).

Additional information required for Mortgage products only:

- Residential status and references (e.g. home owner, tenant, living with relatives)
- Employment status and references (e.g. employed, self-employed, career break, unemployed, retired)
- Financial details (e.g. salary and other income, savings, expenditure, bank account, savings and mortgage goals)
- Offences and proceedings
- Personal information obtained from third parties (e.g. current/previous employer, landlord, mortgage provider, personal referees, credit reference agencies, fraud prevention agencies, publically available sources such as electoral roll, court records of debt judgements and bankruptcies).

Sensitive Information for Insurance only:

Data Protection laws define some personal information as 'sensitive'. This is a special category and includes the types of information listed below:

- Health information (including medical records)
- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data
- Bio-metric data for the purpose of uniquely identifying an individual
- Sex life or sexual orientation.

If you apply to us for insurance products, we may ask you for some of the 'sensitive' information on page 3.

We only use sensitive personal information, where necessary, with your explicit consent or if required by law (e.g. medical/health information which may be used to assess your eligibility for the product/service you have with us, assist you when contacting us or where we believe you or another person may be at risk).

It may be possible to identify other sensitive information about you (e.g. political opinion, religious or philosophical beliefs, trade union membership, genetic data, sex life or sexual orientation) from the information we hold about you, this personal information is not collected, used, shared or stored.

We may also obtain information about you from the following sources:

- You and your representative e.g. financial adviser, solicitor, employer, landlord, lender or medical professional
- Industry databases e.g. credit reference, fraud prevention or insurance
- Publically available directories and information (e.g. postal address file, telephone directory, social media, internet, news articles)
- Our representatives and agents e.g. staff, debt recovery agents
- CCTV covering Society premises.

Why do we need your personal information?

To be able to provide products and services to our customers we need to collect personal information about them. Under Data Protection law we must have a clear legal reason to do this.

We use the personal information we have collected from you to:

- Process your enquiry
- Provide any illustrations you require
- Identify and verify your identity (documents may be checked with issuing authorities e.g. driving licence – DVLA)
- Arrange associated products
- Open and administer accounts and services you have with us
- Ensure fraud prevention and detection
- Meet legal and regulatory requirements
- Contact you where necessary
- Meet our general business purposes (e.g. updating customer records, handling customer queries and complaints)
- Marketing (where we have your consent) and market research
- Handle your queries and complaints
- Perform statistical analysis, including analysis of customer trends and behaviour
- Analyse performance and conduct in relation to products and services held, preferences and assessment of products held and suitability
- Create new products
- Test our computer systems (any personal information will be masked)
- Identifying your tax status (we are required to report if you move from one tax jurisdiction to another).

When will we use your personal information?

We will respect your rights to privacy and will only collect, use, store and share your personal information where a lawful purpose applies:

- It's necessary for the performance of a contract you have or have requested to enter into
- If we have a legal obligation to do so
- If we have consent
- If we have a legitimate business interest where it does not have an unfair impact on you
- Where it's in the public interest or we have been given official authority to do so.

If any of the details we collect, use, store or share is sensitive personal (Special Category) information we will only do this where:

- We have given you a clear explanation and obtained your consent
- We believe you or another person may be at risk to protect yours or their interest
- You have made the information public
- It's necessary to establish, exercise or defend a legal claim
- The law determines there is a substantial public interest but we will always consider and take appropriate measures to safeguard your rights and privacy before doing this.

What do we do with your personal information?

Here we set out the ways we handle your personal information for specific products, Mortgages, Savings and Insurances. We also explain how your information is used with credit reference agencies and fraud prevention agencies.

Applying for a Mortgage - Approval in Principle:

We will check your details against our lending criteria, and may disclose information to a credit reference agency to obtain a credit search, and check details with fraud prevention agencies. This will leave a record of our check on your credit data and may have implications on your future creditworthiness. The record is sometimes known as a footprint.

The credit reference agency may disclose information to its other customers for assessing the risk of giving credit, to prevent fraud and to trace debtors.

Taking out a Mortgage with us:

- When you take out a mortgage account we will use your information to:
 - Process your Approval in Principle
 - Process your mortgage application
 - Provide updates to guarantors where applicable
 - Make credit decisions about you
 - Arrange associated insurance
 - Complete your mortgage and administer your account up to and including redemption.
- If we use an automated system to make a decision about you, such as credit scoring, we will tell you if your application is rejected and give you the opportunity to discuss the matter with us. The decision can be reviewed to ensure an appropriate decision has been made
- We may disclose details of your account, including balance outstanding, interest rate(s) applicable, early repayment charges and monthly payments to potential borrowers and any existing guarantor if one of you in the future enquires about adding or removing a party to the account (also known as a "transfer of equity"). However such a transaction will not proceed without a completed application form signed by all account holders
- If you make a transfer of equity application, any borrower who is to be removed from the mortgage account will remain on that account until our legal advisor sends us written confirmation that the transfer of the mortgaged property has been legally completed. Until we receive confirmation that the transfer of equity has completed all existing borrowers will remain responsible and liable for maintaining the mortgage and keeping payments up to date with access to account details including payments made, payments due, additional lending and progress of the application
- We may disclose guarantor details and payments to account holders or their representatives, when a guarantor exists
- Where the mortgage applied for is an offset mortgage, we may disclose information to the offset mortgage account holder(s), any transferee(s) should the mortgage be subject to transfer of equity (i.e. change of account holders on the mortgage) and any guarantor(s). Disclosure will be limited to information necessary to manage the mortgage account. This may include the savings account balance, significant withdrawals, account closure, notification that total savings exceed the mortgage balance or that total savings are insufficient to support the payment due and a request to de-link the Offset savings account
- If the account is registered as Open Market HomeBuy we may disclose details of the valuation at redemption to your HomeBuy Agent
- We may contact the HM Revenue & Customs, Department For Work & Pensions, any lender, landlord, employer or professional adviser named on your application form, to obtain information, to confirm any income received and payments made.

Taking out a Savings Product with us:

- When you take out an Offset mortgage we will also use your information to:
 - Process your savings application
 - Administer your savings account up to and including closure.

Taking out an Insurance Product with us:

If you take out Home, Payment Protection or other insurance we and/or your insurer may:

- Disclose information you have supplied and details of your policy and claim with:
 - Each other
 - A data administration company
 - Licensed credit reference agencies
 - Relevant insurance companies and
 - Fraud prevention bodies.
- This information will be made available to other prospective lenders and insurers. We and/or your insurer may contact your medical professional representative with your consent to obtain information or confirm a pre-existing medical condition you have informed us of but we will always explain why we need the information, how it will be used and who it will be shared with.

Insurers pass information to the Claims and Underwriting Exchange Register, run by Insurance Database Services Limited (IDS) and for Motor Insurance to the Motor Insurance Anti-Fraud and Theft Register run by the Association of British Insurers (ABI). The aim is to help us check information provided and also to prevent fraudulent claims. When we deal with your request we may search the registers.

When you tell us about an incident (such as fire, water damage or theft) which may or may not give rise to a claim, we will pass the information relating to it to the relevant register.

IDS may also pass on information received from other insurers about other incidents involving anyone insured under the policy.

Business Relationships

If you have a business relationship with us as an introducer or intermediary or are party to a mortgage application in any professional capacity we will record your details on our systems and use them as necessary to manage the service and pay commission if appropriate.

Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more Credit Reference Agencies ("CRAs"). Where you take banking services from us we may also make periodic searches with CRAs to manage your account with us.

We will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

For all product and services we will use this information to:

- Verify the accuracy of the data you have 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.

For Mortgage Products:

- Assess your creditworthiness and affordability
- Routinely carry out an additional credit search for account management purposes but this will not affect your future creditworthiness. This will not leave a hard footprint on your records
- Carry out a credit reference search with one or more licensed Credit Reference Agencies (CRA). This may have implications on your future creditworthiness
- Whether or not your application is successful, each CRA will add details of the search, and your application, to their records and will share this information with other lenders and grantors of credit and insurance who will use it when assessing any applications for banking, loan, hire facilities or insurance which you may make in future. They will use it for verifying identity, fraud prevention, debt recovery and tracing debtors. The CRA may also use the information for statistical analysis and market research.

We may, where necessary, pass your details to third party organisations so they can provide a quote or administer a claim for you. We will only do so under a contract that protects the security of your information.

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. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in any of the three CRAs websites listed below.

We may disclose information you have supplied, and details of how you conduct your account (including arrears, defaults and repossession proceedings), to credit reference agencies and fraud prevention bodies.

Visit one of the following websites to view detail about the Credit Reference Agency Information Notice (CRAIN).

- Call Credit - www.callcredit.co.uk/crain
- Equifax:- www.equifax.co.uk/crain
- Experian - www.experian.co.uk/crain

Fraud Prevention

Before we provide products or services to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal information about you.

The personal information you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.

Details of the personal information that will be processed, for example: name, address, date of birth, address, contact details, financial information, employment details, device identifiers including IP address and vehicle details.

We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal information 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 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 information 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.

As part of the processing of your personal information, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk or if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity.

You have rights in relation to automated decision making. You can find out more in 'Your Rights and Data Protection' booklet which can be found online at www.accordmortgages.com or by calling 0345 1200 872.

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

Whenever fraud prevention agencies transfer your personal information outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

Please write to Group Risk Department, Yorkshire Building Society, Yorkshire Drive, Bradford BD5 8LJ if you want to receive further details of the relevant fraud prevention agencies.

The details of the fraud prevention agencies from whom we obtain and record information are:

- National Hunter Limited, PO Box 2756, Stoke on Trent, ST6 9AQ www.nhunter.co.uk
- CIFAS 6th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LT www.cifas.org.uk

When we no longer need your personal information

We will only keep personal information as required to meet our legal and regulatory obligations or to deal with your enquiry, administer, and manage your accounts, products and relationship with us. After this time, we will delete your personal information in line with the requirements of the Financial Conduct Authority, Prudential Regulation Authority, Money Laundering regulations, Financial Ombudsman Service, HMRC and any other regulatory bodies.

Our website activities

We use technical methods (called "cookies") on our websites. Cookies are 'text files' that allow us to:

- Identify what stage in an application process you are at
- Improve your experience by making it quicker and easier for you to use the site
- Identify how effective our advertising is and provide you with information in the future we believe is relevant to you.

You can find out more about how we use cookies and how you can manage them in the Privacy & Cookies section on our website (www.accordmortgages.co.uk).

Sharing and transferring your personal information

We will only share your personal information as required to meet our legal and regulatory obligations, or to deal with your enquiry, administer and manage your accounts, products and relationship with us. Below we have listed scenarios in which your information may be shared or transferred.

- We may share information about you with a joint account holder if they make an enquiry or further application without you being present where they confirm they have your authority to act on your behalf
- We will share the progress of your application, including if it has been granted, to your broker, Independent Financial Adviser, professional adviser or other intermediary, if the request came from them
- We use CCTV in some of our premises. We would only share this information with authorities for crime prevention and public safety
- We may disclose personal information to (i) our external auditors and regulatory bodies including the Financial Ombudsman Service, Prudential Regulation Authority and the Financial Conduct Authority (FCA), and (ii) associate companies, agents and service providers including solicitors and valuers acting for the Society, field agents, debt recovery agents, tracing agents, letting agents, brokers, printers, market research agencies and providers of information technology services
- We may occasionally need to transfer personal information to countries outside the European Economic Area (EEA). This will only be done under a contract which includes appropriate safeguards for the security and confidentiality of your personal information, with your consent, or where permitted by Data Protection laws
- If we sell or transfer all or part of our business, we may share or transfer our customer records as part of the proposed/actual sale or transfer. However, we will only do so under a contract or where we have a legal obligation to do so. The protection, security and confidentiality of your personal information are important to us and we put in place appropriate safeguards to manage this
- Customers have a right, for certain types of online accounts, to instruct Third Party Payment and Information Providers to facilitate payments and provide aggregation services for their financial information. Accord Mortgages will only send your data to these third parties once we have received confirmation from yourself and only to those who have the relevant authorisation from the FCA. Your selected data, once authorised by you, is sent through secure means to the authorised third party
- If a payment is made into your account by mistake we are required to co-operate with the originating financial institution to assist in recovering mistaken payments. This includes a requirement for us to provide them with all relevant personal information they need to claim repayment of the funds, if the funds aren't recovered this information may also be given to the individual who originally made the transaction.

Transferring your mortgage:

Although you may not transfer your interest in the mortgage without consent, there is no restriction in the mortgage against a transfer of our interest. Accord Mortgages Limited may transfer its interest in your mortgage to another party which may not necessarily be a building society or an associated body of a building society. Accord Mortgages is part of the Yorkshire Building Society group but is a separate legal entity from Yorkshire Building Society. You will not be a member of, or have any membership rights in Yorkshire Building Society.

Our relationship with other organisations

If we offer you products or services from other organisations and you take these products you will be entering into a contract with the organisation concerned. These contracts safeguard the security and confidentiality of your information.

We will share relevant information with associate companies, agents and service providers to administer the service provided such as suitability, products taken, payment of commission, complaints and to manage our customer relationship with you.

We have a relationship with the companies listed below:

- Target Servicing Limited for Buy to Let application processing and account management
- Legal & General for mortgage-linked life insurance
- Royal & Sun Alliance Insurance for household insurance
- Cardiff Pinnacle for mortgage payment insurance and short term income protection
- AIG Life Limited for life insurance and critical illness insurance
- United Legal Services for conveyancing services (Accord Residential)
- Legal Marketing Services for conveyancing services (Accord Buy to Let)
- Communisis UK Limited for printing services
- ICR Speech Solutions and Services Limited (for text messaging services).

All companies we work with are assessed for adequacy of their security controls.

Do you have to provide your personal information to us?

We are unable to provide the products requested or to process your application without your personal information. We will only ask for the information required. Your personal information is required before you can enter into the relevant contract with us, or when it is required during the life of the contract or when it is required by laws that apply to us.

What should you do if your personal information changes?

You should tell us without delay so that we can update our records. You can do this by calling 0345 1200 100 for Accord Residential Mortgages, or 0345 8480 224 for Accord Buy to Let.

If you were introduced to us by a broker or other intermediary who is a data controller in their own right, you should contact them separately. In some cases where you exercise rights against us under data protection law we may also need to inform the broker or other intermediary.

Managing our contact with you

If you have provided your consent we would occasionally like to keep you informed of products, services and offers provided by us, our subsidiary companies and carefully selected organisations that we think are appropriate to you. Details of these organisations are available in the section 'Our Relationships With Other Organisations'.

We will respect your right to privacy and only contact you in a way that is personal to you and that you have previously agreed to. This may include post, email, text message, telephone or any other available messaging service. You can withdraw consent at any time and we will stop sending you details of our marketing offers.

If you change your mind at any time about the contact methods you have agreed to, just let us know by calling 0345 1200 100 for Accord Residential Mortgages, or 0345 8480 224 for Accord Buy to Let.

If you are an existing customer, with any trading name operated by us or any subsidiary company, the methods you have agreed to us contacting you by about products, services and offers will automatically be updated and you will not need to notify them separately.

We will not sell your details to other companies but we may use marketing agents to act on our behalf.

If you subscribe to one of our special customer services (e.g. our Savings Pledges) – we will contact you by email to keep you informed of new savings accounts until you unsubscribe from the service. These special services are not linked to and do not

affect the marketing permissions and other details you have registered with us.

How you can contact us

If you think your personal information has been misused or that Accord Mortgages hasn't kept it secure, you should contact the Data Protection Officer. Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information.

You can contact the DPO by writing to
Data Protection Officer
Yorkshire House
Yorkshire Drive
Bradford
BD5 8LJ

Or by emailing dpo@ybs.co.uk

You have a number of rights under Data Protection laws. These are your rights to:

- Be informed about processing of your personal information
- Have your personal information corrected if it is inaccurate or incomplete
- Object or restrict to the processing of your personal information
- Have your personal information erased subject to conditions (e.g. where the processing fails to satisfy legal requirements)
- Request access to your personal information and details about how we process it
- Move, copy or transfer your personal information also known as 'data portability'
- Challenge automated decision making including profiling, which is the automated processing of your personal information to evaluate certain things about you.

If you are not happy with a response from us you can also contact The Information Commissioner's Office (ICO) by post at ICO Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or visiting the ICO at www.ico.org.uk.

Our 'Your Rights and Data Protection' Booklet provides more information on data protection laws, our legal obligation and your individual rights in relation to the processing of your personal information. To obtain a copy of this booklet visit our website www.accordmortgages.com or alternatively call us on 0345 1200 100 for Accord Residential Mortgages, or 0345 8480 224 for Accord Buy to Let.

If you want to see what personal information we hold about you, you can request a copy of this by completing a Subject Access request form. This form can be found on our website www.accordmortgages.com or by putting a request in writing to our head office address.

Our printed material is available in alternative formats e.g. large print, Braille or audio. Please call us on **0345 1200 872**.

All communications with us may be monitored/recorded to improve the quality of their service and for your protection and security. Calls to 03 numbers are charged at the same standard network rate as 01 or 02 landline numbers, even when calling from a mobile.

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. Accord Mortgages Limited is registered in England No: 2139881. Registered Office: Yorkshire House, Yorkshire Drive, Bradford BD5 8LJ.

Accord Mortgages is a registered Trade Mark of Accord Mortgages Limited.