Privacy Notice

The following definitions explain some of the terms used throughout this Privacy Notice:

Automated decision-making: When a computer system makes a decision about you without a person making that decision first

Profiling: Looking at information about you to help assess or predict certain things, such as your preferences or financial circumstances

Process or **processing**: Anything we do with your personal information, including collecting it, using it, storing it, sharing it and deleting it

Legitimate interests: A lawful reason for using your personal information where it's necessary for our business or services, while ensuring your rights and interests are properly protected

Our commitment to protecting your personal information

Respecting your privacy. We respect your privacy and are committed to protecting your personal information. Looking after your data is an important part of the trust you place in us as a building society, and we take that responsibility seriously. We will use your personal information carefully, fairly and lawfully, and where we have a clear and proper reason to do so. We are open about how and why we use your information, and we aim to explain this in a clear and straightforward way so you can understand and exercise your rights with confidence.

How we keep your information safe. We have measures in place to protect your personal information against loss, misuse, unauthorised access or disclosure. Access is restricted to those who need it to do their job, and we regularly review our controls to ensure they remain effective. We also expect the same high standards from any third parties who process personal information on our behalf, and we require them to protect your data in line with our own expectations and applicable data protection laws.

Using your information fairly and responsibly. We will use personal information in a way that is proportionate and respectful, and not in ways that would be unfair or unexpected. Where we use information to support decision-making, we will do so responsibly and with appropriate safeguards in place. Where possible, we minimise the amount of personal information we use, keep it accurate and up to date, and retain it only for as long as necessary to meet our legal, regulatory and operational obligations.

Your rights and how to exercise them. You have important rights over your personal information, including the right to access it, correct it, object to certain uses, or ask us to restrict or delete it in some circumstances. We are committed to respecting those rights and making it easy for you to exercise them. We welcome engagement on privacy matters and treat concerns seriously.

How we use your personal information

This privacy notice explains how Dudley Building Society (“we”, “us” or “our”) uses your personal information. It tells you:

- who we are and how to contact us;
- what personal information we collect and where we get it from;
- how and why we use your personal information;
- who we share it with;
- how long we keep it;
- when it may be transferred outside the UK; and
- what rights you have and how to exercise them.

Who we are

Dudley Building Society
7 Harbour Buildings
The Waterfront
Brierley Hill
DY5 1LN

We are the controller for your personal information. This means we decide how and why your personal information is used. If you applied for a mortgage from us via a mortgage broker or intermediary, they will be the controller for personal data they collected before submitting the application to us, and remain a controller in respect of that data.

If you have any questions about this notice or how we use your personal information, you can contact us using the details at the end of this notice.

The personal information we collect

The personal information we collect about you depends on the products or services you apply for or use, and how you interact with us. We collect information about you when you:

- apply for products or services;
- update your information in branch, online or over the phone;
- visit us in branch or speak to us on the phone;
- use our website;
- send us letters, emails, other documents or online messages.

Personal information we collect from you

This may include:

- your full name, title, date of birth, age, customer number and account number (**Identity**);
- your address, email address and phone number (**Contact**);
- information about your finances, such as income, savings, expenditure, debts, account and credit/debit card details, spending habits, transaction history, tax status and source of funds (**Financial**);
- information about your family including marital status, next of kin, dependents and emergency contacts (**Family**);
- identification information, such as passport, driving licence details and national insurance number (**Identification**);
- your sex, occupation, employment status, nationality, citizenship status, residential status, property details, occupancy status and insurance information (**Profile**);
- how you interact with us, including phone calls and recordings, video recordings, photographs, emails and online activity (**Interaction**);
- technical information, such as IP address and location data and device information when you use our website or digital services (**Technical**).

Special categories of personal information

In some circumstances, we may also collect more sensitive information, such as:

- health information, which includes any physical/mental disability or medical condition (**Health**);
- criminal data including offences, allegations, convictions and investigations, penalties and restrictions, CCJs and bankruptcy and insolvency details (**Criminal**);
- information about your race or national or ethnic origin, religion or beliefs, sexual orientation and political affiliations (**Sensitive**).

It is important that the personal information we hold about you is up to date and accurate. Please tell us if anything changes such as your contact details or personal circumstances.

Personal information we collect from others

We may also receive personal information about you from third parties, such as:

- Credit Reference Agencies (**CRAs**), to perform credit, identity and fraud prevention checks against public and shared credit information (Credit Reference Agency Information Notice (CRAIN));
- fraud prevention agencies such as CIFAS (www.cifas.org.uk) and National Hunter (www.nhunter.co.uk);
- directly from public sources, for example the electoral register, Companies House, the Insolvency Service;
- open-source information available on the internet such social media platforms;

- suppliers and their sub-contractors;
- business partners, advertisers and referrers;
- other people connected to your account, for example a joint applicant, trustee, parent, guardian, nominated representative, attorney or mortgage broker or mortgage intermediary who is acting on your behalf.

If you provide us with personal information about someone else, we will assume that you have made them aware of how we will process their personal information. We will record what you have provided and who gave it to us.

Our legal grounds for using your information

The law requires us to have a valid reason for using your personal information. These include:

- performing a contract with you, or taking steps before entering into a contract (**Contract**);
- complying with our legal or regulatory obligations (**Legal Obligation**);
- our or a third party's legitimate interests, where these are not overridden by your rights and interests (**Legitimate Interest**);
- your consent, where we specifically ask for it (**Consent**).

Where we rely on Consent, you can withdraw it at any time. Where we rely on Legitimate Interests, you may object to the processing. More information on your rights is at the end of this notice. The next section shows how we process personal data and the legal basis for doing so in each case.

How we use your personal information

We use your personal information to...

Purpose	Type of personal information	Legal basis
...consider applications for our products and services	Identity, Contact, Financial, Family, Profile, Identification	Contract
...set up, administer and manage your accounts and transactions	Identity, Contact, Financial, Family, Profile, Identification	Contract
...manage your membership with the Society and keep in touch with you	Identify, Contact	Legal Obligation; Contract
...communicate with you about your accounts, products, and services	Identity, Contact, Financial	Legitimate Interest

...administer and manage competitions, prize draws and referral schemes	Identity, Contact	Consent; Legitimate Interest
...develop and improve our products, services, policies, and processes	Identity, Contact, Financial, Family, Profile, Identification	Legitimate Interest
...market our business, products, and services	Identity, Contact, Profile	Consent
...deal with queries, complaints, and requests	Identity, Contact, Financial, Profile	Legitimate Interest
...carry out market research and obtain feedback from you	Identity, Contact	Legitimate Interest
...obtain legal advice	Identity, Contact, Financial, Family, Profile, Identification	Legitimate Interest
...comply with law and regulation	Identity, Contact, Financial, Family, Profile, Identification	Legitimate Interest; Legal Obligation
...test our systems, processes, and technology	Identity, Contact, Financial, Profile	Legitimate Interest
...monitor our website and online services to protect against cyber threats	Technical	Legitimate Interest
...audit our products, processes, services, and records	Identity, Contact, Financial, Family, Profile, Identification	Legitimate Interest
...record CCTV images at our branches and premises for safety and security	Identity	Legitimate Interest
...protect our business, customers, members and third parties from financial crime including fraud	Identity, Contact, Financial, Family, Profile, Identification	Legitimate Interest; Legal Obligation
...support you if you fall into arrears and to manage debt collection processes	Identity, Contact, Financial, Profile	Legitimate Interest
...administer our power of attorney process	Identity, Contact, Financial, Profile	Legitimate Interest

We only use your personal information where the law allows us to do so.

In addition, we use special category personal information to…

Purpose	Type of data	Legal basis
…make adjustments to our services to meet vulnerable customer needs	Health	Consent
…prevent, detect, and investigate fraud and suspicions of money laundering and terrorist financing	Criminal	Legal Obligation; Substantial public interest

Sharing your personal information

We may share your personal information with:

- service providers who support our business, such as IT, payment and mailing providers;
- credit reference agencies and fraud prevention agencies;
- regulators, tax authorities, government bodies and law enforcement agencies;
- prosecuting authorities and courts, and third parties connected with legal proceedings;
- professional advisers, such as auditors or legal advisers;
- third parties where you ask us to do so;
- third parties where it is necessary to enter into or for the performance of a contract, or provide our services;
- third parties if required to do so by law.

We only share personal information where it is necessary, and we take steps to ensure it is protected.

Artificial intelligence

Artificial Intelligence (AI) means a computer program that processes information and generates outputs, for example content, recommendations, or decisions. We may use technology and automated tools, including AI, to:

- support you;
- improve the quality and efficiency of our services;
- enhance our processes;
- manage risk;
- audit and assure our services,

Where we use these tools:

- we apply appropriate safeguards;
- our team members check outputs to make sure we are processing your personal information fairly and accurately; and
- we aim to use the minimum personal information needed.

Transfers outside the UK

Sometimes your personal information may be transferred or stored outside the UK. We only do this when required or permitted by law or regulation, or where we are sharing personal data with a third party to support us in managing your account. When this happens, we ensure appropriate safeguards are in place so that your information continues to be protected. This usually means either making sure that in the Information Commissioner's view, the country has an adequate level of protection and/or requiring contractual safeguards so that third parties take appropriate steps to protect personal data.

How long we keep your personal information

We keep your personal information only for as long as is necessary. This depends on a range of factors including:

- the purpose for which it was collected;
- legal and regulatory requirements;
- our contractual obligations.
- your membership status and type of account, product and service;
- the cost of keeping and retrieving records;
- the need to establish, exercise or defend legal claims.

Please contact us if you would like more information.

Profiling and automated decision-making

Profiling is the automated analysis of personal data to evaluate, predict or analyse a person's behaviour, interests or habits. We may do this to ensure we are giving you products and services that meet your needs and ensure good outcomes. We seek where possible to make sure any personal data we use is anonymous so you are not identifiable, and only produce statistical reports. You may object to us using your personal information for profiling activities.

Automated decision-making (ADM) is making decisions solely by technological means without human involvement. We may use ADM before agreeing to enter into an agreement with you, and to comply with legal and regulatory obligations.

See below for your rights and how to exercise them.

Your rights and how to exercise them

You have rights under data protection law that are listed below. Some of these rights are subject to exceptions and limitations. You may exercise your rights by contacting us.

- Right to be **informed**: you are entitled to receive clear and transparent information about how we process your information.
- Right to request **access** to your personal information. This is commonly called a "data subject access request". This includes knowing what personal information we hold about you and why we hold it.
- Right to request **correction**: you can ask us to correct your personal data If you believe what we hold is inaccurate or incomplete.
- Right to request **erasure** of your personal information. This is commonly known as the "right to be forgotten". You may ask us to delete or remove personal information. However, this may not always be possible for legal reasons.
- Right to request **restriction** of processing: You may ask us to stop processing your personal information, although we will still hold the data. You may exercise this right if you contest the accuracy of the personal data <u>or</u> our processing is unlawful <u>or</u> we no longer need the personal data but it is required for a legal process <u>or</u> you have exercised your right to object and processing is restricted while awaiting a decision on the status of the processing.
- Right to data **portability**. You may ask use to transfer your personal information to another controller or processor. The original processing must have been based on consent, by automated means, and if the processing is to meet a contractual obligation.
- Right to withdraw **consent**. If we are relying on your consent to process personal information, you may withdraw your consent at any time.
- Right to **object**. You may object to our processing your personal data where we are doing so based on having a legitimate interest or it is for direct marketing purposes.

To exercise any of your rights, please contact us:

Customer Services Team
Dudley Building Society
7 Harbour Buildings
The Waterfront
Brierley Hill
DY5 1LN

Telephone: 01384 231414

We may require information from you to help us verify your identity before we can review your request.

Making a 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 complain directly to us by using the contact details given in this notice. If you are not satisfied with the way we handle your complaint, you may complain directly to the UK Information Commissioner's Office via the details available on their website: www.ico.org.uk.

Data Protection Officer (DPO)

You may contact our DPO if you have any questions about this notice, how we use your personal information or wish to exercise any of your rights. Please use the contact details above.