

BROKER PRIVACY NOTICE

(Last updated 25 August 2021)

This privacy notice describes how Harpenden Building Society (the Society, we) will deal with your personal information, and that of your applicants for our mortgage products. We also have a general privacy notice on our website that describes the controls that we have in place over all personal information, and how we use cookies on our website.

This privacy notice may be updated from time to time so please check for updates on this website to make sure you are aware of how we currently process personal information.

CONTACT US

To exercise any of these rights, or to ask any questions about how we process personal information, or to complain about this, please email the Society's Data Protection Officer at privacy@harpendenbs.co.uk or phone on 01582 765411, or write to:

The Data Protection Officer
Harpenden Building Society
Mardall House
9-11 Vaughan Road
Harpenden
Hertfordshire AL5 4HU

If you are not satisfied with the handling of any complaint by the Society, you can also make a complaint to the Information Commissioner's Office at: <https://www.ico.org.uk>.

DATA PROTECTION RESPONSIBILITIES

Where you contact the Society to enquire about our products or rates, we will act as the data controller for your personal information. We will process your information for as long as you wish to receive this information from us.

Responsibilities for protecting a mortgage applicant's personal information change through the application and lending process:

Once an applicant contacts you to find a suitable mortgage product, you act as the data controller for the applicant's personal information.

When you send the applicant's personal information to us as part of an enquiry about our mortgage products, we will act as the data processor on your behalf.

However, once we send the applicant an Offer in Principle, we become the data controller of the applicant's personal information. For any personal information subsequently sent to us through you, you will act as the data processor.

Once we advance the mortgage funds, and you have been paid your commission, the applicant's personal information will no longer be sent through you but will be sent directly to us. We will remain the data controller for the period of the mortgage contract.

YOUR PERSONAL INFORMATION

Data protection laws require us to explain what legal grounds justify our processing of personal information, including sharing it with other organisations. More than one legal ground may be relevant for some processing, except where we rely on consent. The legal grounds that are relevant to us are:

- Fulfilling our agreement with you and with applicants

- Complying with the law
- Achieving our legitimate interests as a building society, and
- Supporting the public interest or protecting your vital interests.

TRANSFERS OF INFORMATION OUTSIDE THE EEA

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area (EEA). If it is processed within the EEA then it is protected by European data protection standards. Some countries outside the EEA have equivalent protections for personal information and so we are allowed to transfer personal information to companies based in these countries.

MONITORING AND PROFILING

We may monitor your use of our website where permitted to do so by law and where the law requires it. In addition, we will record certain telephone lines or in person meetings where we are required to by the Financial Conduct Authority.

We may use your personal information to profile your activity and may use an applicant's personal information to profile their financial situation. We may do this lawfully to help us fulfil our contracts, or for legal or regulatory purposes, or for our legitimate interests as an organisation.

YOUR RIGHTS

You and applicants have a series of rights over how your personal information is processed and have the right to exercise these rights at any time:

- To be informed
- To request access
- To object to processing
- To restrict processing
- To have personal information 'erased', and
- To obtain a copy of one's personal information.