

DATA PROTECTION BROKER PRIVACY NOTICE

1. BROKER PRIVACY NOTICE

This Privacy Notice describes how Harpenden Building Society (the Society, us, we) will deal with your personal data, and that of your applicants for our mortgage products. We also have a general privacy notice on our website that describes how we will use customers' personal data, and how we use cookies on our website.

Our Privacy Notices are addressed to UK residents only, unless stated otherwise, and may be updated from time to time so please check this website for updates.

This Privacy Notice is provided electronically on our website and is available through a QR code provided as part of our paper-based application form. A copy can also be requested by contacting us by phone, or letter, or email, or in person at any branch.

2. CONTACT US

If you have any questions about how we deal with your personal data, or that of your applicants, or wish to make a complaint about this, please email our Data Protection Officer (DPO) at privacy@harpendenbs.co.uk or by phoning 01582 765411, or by writing to:

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

If you are not satisfied with our handling of any questions about data protection, you can also make a complaint to the Information Commissioner's Office at: ico.org.uk.

3. DATA PROTECTION RESPONSIBILITIES

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

Responsibilities for protecting a mortgage applicant's personal data ordinarily 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 data.
- When you send the applicant's personal data 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 data. For any personal data 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 data 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.

4. YOUR PERSONAL DATA

Where you act as a self-employed broker, or are a partner in a traditional broker partnership, data protection laws require us to treat your personal data as we would an applicant's personal data.

Where you are an employee of a broking firm, or are a partner of a limited liability broker partnership, we do not have to treat your personal data as we would an applicant's personal data, but we will endeavour to treat it in line with good data protection principles.

We are obliged to explain what legal grounds justify our processing of personal data. The legal grounds for our processing your personal data are:

- Fulfilling our agreement with you to consider your applicants for our mortgages.
- Complying with the law, such as anti-money laundering legislation.
- Supporting the public interest, or protecting your vital interests, and
- Achieving our legitimate interests as a building society, such as monitoring your access to our website, carrying our market research surveys, carrying our mortgage market analysis, communicating with you about improvements to our services, and communicating marketing messages to you.

4.1 PERSONAL DATA WE PROCESS OF YOUR APPLICANTS

When you propose an applicant for one of our mortgage products, you must refer the applicant to our Customer's Privacy Notice on our website

(<https://www.harpendenbs.co.uk/about-us/your-privacy/privacy-notice/>) before you send us any personal data about the applicant.

The personal data that we process of your applicants includes:

- Their name and contact details, including email address, home and mobile telephone number.
- Their home address, correspondence address (where it is different from their home address) and their address history.
- Their date of birth and age, to make sure that they are eligible to apply for the product and that it is suitable for them.
- Their nationality, if this is necessary for us to comply with our legal and regulatory requirements.
- Their financial health such as income and savings, summaries of expenditure, and information about any other savings or mortgage accounts.
- Their existing loans.
- Their credit history which we obtain from Credit Reference Agencies (CRAs).
- Their current employment status and income.
- Whether they own or rent their current property.
- Whether they have permanent right to reside in the UK.
- Their family background if this is relevant to the mortgage application.
- Where relevant, information about any guarantor provided in a mortgage application, and
- Some special categories of personal data such as about the applicants' health or if they are a vulnerable customer.

We are required by law to process the applicant's personal data before we can offer them a mortgage product. Once the applicant has accepted one of our products, we will also need to process their personal data throughout the life of the product in order to comply with the law.

However, we do not collect other special categories of personal data about the applicant such as details about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or genetic and biometric data. Nor do we collect any data about any criminal convictions and offences.

In order to process the application and comply with the law, we will perform credit and identity checks on the applicant with one or more Credit Reference Agencies (CRAs). We may also perform periodic searches on the applicant's financial circumstances to help us manage any mortgage and comply with the law. You must refer the applicant to a CRAIN Notice, available on our website (www.harpendenbs.co.uk/credit-reference-agency-information-notice) before you send us any personal data about the applicant.

The personal information we collect from your applicants will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify

their identity. If fraud is detected, your applicant could be refused certain services, finance, or employment. Further details of how this information will be used by us and these fraud prevention agencies, and your applicants' data protection rights, can be found at www.cifas.org.uk/fpn.

4.2 JOINT APPLICATIONS, GUARANTORS, AND POWERS OF ATTORNEY

If the applicant is making a joint application with their spouse, partner or family member, or a guarantor, or someone who has power of attorney for the applicant, we will also collect and process personal data about those persons. You must also refer all those involved with the application to the Customer's Privacy Notice on our website (<https://www.harpendenbs.co.uk/about-us/your-privacy/privacy-notice/>) before you send us any personal data about the application.

4.3 VULNERABLE ADULTS

We will assess all applicants for vulnerability in order that their needs can be recognized and we can treat them fairly. You must share information about potentially vulnerable applicants with us, in a way that respects their dignity, and complies with data protection laws.

4.4 IF YOUR PERSONAL DATA CHANGES

If your personal data changes you should tell us without delay so that we can update our records. If your applicant's personal data changes, you should also update us about these changes.

5. TRANSFERS OF PERSONAL DATA OVERSEAS

In order to manage your personal data, and that of your applicants, we may need to use companies that process personal data overseas. Where personal data is processed in the European Economic Area (EEA) (the EU plus Norway, Iceland, and Liechtenstein), it is protected as in the UK as companies in these countries also must comply with the GDPR.

Some companies operate outside the EEA, but do so from countries that the UK recognises has equivalent protections over personal data as under the GDPR (including Switzerland, Israel, Japan, and New Zealand).

Companies based in other countries that do not provide equivalent protections to the GDPR, such as the United States, can only process your personal data under strict controls including due diligence checks, standard contract clauses, complying with the Data Privacy Framework, and an assessment of the potential risk of disclosure of personal data.

6. MONITORING AND PROFILING

Where we are permitted by law, or where we are required to by law, we will monitor visitors to our website. We will also record certain telephone calls, or in-person meetings, such as branch visits by customers, to comply with the Financial Conduct Authority's regulations.

We may also process your personal images as part of our CCTV coverage if you visit our head office or a branch. We would only do this to prevent, detect and prosecute crime. We retain these images for 30 days after which they are deleted.

Any profiling that we carry out of the broker market will never be fully-automated and will always include staff oversight.

7. YOUR MARKETING PREFERENCES

Where we are obliged by our regulators to update you about features of our products, or where you have consented to receiving updates on Society products similar to those that you have already proposed to applicants, we may update you by letter, or by email.

We would only ever contact you according to your marketing preferences, so where you personally have registered with the Mail Preference Service, we will not send you updates on our products by letter.

Where you have registered personally with the Direct Marketing Association's Email Preference Service, we will not send you updates on our products by email.

With every update about our products, you will have the opportunity to ask us to stop sending updates. You can also do this easily by contacting us, by email, phone or through your local branch.

8. RETENTION OF YOUR PERSONAL DATA

Where your personal data has been collected as part of an agreement between us, we will retain this personal data for six years after we cease our agreement with you. This is the minimum retention period required by law.

At the end of the retention period, we will delete your personal data, unless we have a legitimate interest in retaining it to defend legal claims against us. Any personal data retained after the end of the retention period will be archived.

9. YOUR DATA PROTECTION RIGHTS

You have data protection rights over how we use your personal data, and you can exercise these rights at any time. You can do this by contacting us, by email, phone or through your local branch.

Once you ask us to exercise your data protection rights, we may need to request specific information from you to help us confirm your identity and to clarify which rights you wish to exercise.

We try to respond to all requests within one month but if it may take longer, we will inform you.

You will not have to pay a fee, but we may need to charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Your data protection rights are:

- The right to be informed about processing.
- The right of access to your personal data.
- The right to rectify your personal data.
- The right to object to processing of your personal data.
- The right to restrict processing of your personal data.
- The right to have your personal data deleted (the right to be forgotten).
- The right to obtain a copy of your personal data, and
- The right to object to automated decision-making.

9.1 HOW TO EXERCISE YOUR RIGHTS

To exercise your data protection rights, or to find out more details on how we process your personal data, please contact us by email, phone on 01582 765 411 or through your local branch. Or write to:

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

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