The **co-operative** bank

Using your personal information

Important – This document replaces all other versions of this notice which you may have received from The Co-operative Bank

The following sections explain how and for what purposes The Co-operative Bank p.l.c. (also trading as smile and Britannia) and its subsidiaries (referred to as "we", "us" or "our") will use your personal information.

We currently may hold personal and financial information about you and may obtain or receive such information about you in the future. The information we process about you will be obtained from various sources including:

- directly from you;
- from the operation of your accounts and services, including account transactions;
- from our affinity partners;
- from other organisations including credit reference and fraud prevention agencies; and
- from persons who know you including joint account holders and persons with whom you are financially linked in the context of a particular product.

We may link information concerning your accounts with us to information relating to products and services we provide to you.

Such information may also include sensitive personal data, such as information relating to your health or criminal convictions or proceedings. However, we only hold such data where we need to for the purposes of the product or services we provide to you (for example, insurance products) or where it is in our normal course of business to do so. This includes the following purposes:

- to make credit decisions about you and anyone to whom you are linked financially or other members of your household (which may involve credit scoring);
- managing credit and credit-related facilities;
- to consider and implement business, product and technology developments;
- to undertake statistical analysis, financial risk assessment, money laundering checks (which may include telephoning you), compliance and regulatory reporting, fraud prevention and recovering debt;
- to help us identify products and services which may be of interest to you (unless you have asked us not to);
- meeting any obligations we may have under a card scheme, under which any cards we have provided to you have been issued; and
- systems testing and development.

We will disclose information outside The Co-operative Bank only:

- if compelled to do so by law;
- if appropriate, where you have provided your consent (which is not necessarily required to be in writing);
- where we have a public duty to disclose the information;
- to our agents or subcontractors for operational reasons;
- to third parties, such as affinity partners, who have introduced your custom to the Bank - we may pass back to the introducer information to enable administration of any payment or settlement, or of any benefit to you under the affinity agreement;
- to any persons, including, but not limited to, insurers, who provide a service or benefits to you or for us in connection with your account(s);
- to licensed credit reference agencies and fraud prevention and other agencies;
- where we need to do so to comply with the requirements, codes or recommendations of any of our regulators;
- to confirm your identity for money laundering purposes, which may include checking the electoral register;
- to any person to whom we will or intend to transfer our rights or obligations;
- to any subsidiary of the Bank or holding company thereof from time to time and each subsidiary from time to time of any such holding company; and
- to The Co-operative Group for the administration of its Membership scheme.

We may disclose your information to licensed credit reference agencies to help make financial decisions (this will be during the application process and on an on-going basis, to decide whether to continue to make products or services available to you or adjust any level of credit) for you and anyone with whom you are linked financially or other members of your household – our enquiries or searches may be recorded – and credit reference agencies may supply us with financial information. If you make several credit applications within a short time, this may temporarily affect your ability to obtain credit.

We may also disclose information to licensed credit reference agencies about how you conduct your account(s) and this information may be shared with other financial institutions to help make financial decisions about you and anyone with whom you are linked financially, or other members of your household. If you borrow and do not repay in full and on time, we may tell credit reference agencies who will record the outstanding debt.

A link between joint applicants and/or any individual identified as your financial partner will be created at credit reference agencies, which will link your financial records. You and anyone else with whom you have a financial link understand that each other's information may be taken into account in all future applications by either or both of you. This linking will continue until one of you successfully files a disassociation at the credit reference agencies.

If false or inaccurate information is provided by you or on your behalf, if we suspect fraud or if fraud is identified, details will be kept in our records and also passed to fraud prevention agencies, law enforcement agencies and other organisations involved in crime and fraud prevention which may access and use this information. We and those other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- checking details on applications for credit and credit related or other facilities;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance; or
- checking details of job applicants and employees.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. If you would like details of the agencies from which we obtain and record information about you, please write to: Fraud Operations, The Co-operative Bank, Pennylands House, Skelmersdale WN8 8LP.

From time to time we will engage service providers, agents and subcontractors to provide services. They will have access to, and will process, your information on our behalf to provide such services. This may involve the transfer of your information abroad to countries outside the European Economic Area. In these circumstances, we will ensure they agree to process your information only in accordance with the applicable legislation and under strict obligations of confidentiality.

We may contact you by post, phone, email, SMS text or other reasonable means to inform you about products and services supplied by ourselves or selected third parties (including The Co-operative Group and its subsidiaries) that we consider may be of interest to you. We may also share your information with those carefully selected third parties so that they can contact you directly. You can inform us at any time if you do not want to receive marketing information.

You are entitled to a copy of the personal information we hold about you on payment of a fee. For further information on your rights under the Data Protection Act, you can contact: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or visit **www.ico.gov.uk**

We may record and/or monitor telephone calls to enhance security, to help address complaints, improve our customer service and for staff training purposes.

We need the information we hold about you to be accurate and up to date. Please help us by informing us promptly of any changes to your personal circumstances or details.

Please call 08457 212 212 if you would like to receive this information in an alternative format such as large print, audio or Braille.

The Co-operative Bank is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (No.121885) and holds an Interim Permission in respect of consumer credit activities and subscribes to the Lending Code and the Financial Ombudsman Service. The Co-operative Bank p.l.c., P.O. Box 101, 1 Balloon Street, Manchester M60 4EP. Registered in England and Wales No. 990937.

Calls may be monitored or recorded for security and training purposes.