



DATA PROTECTION GUIDE

Progressive Building Society is committed to keeping your information secure and private. Physical and electronic measures have been put in place to keep your data safe. This guide sets out the key points in relation to why we collect and process your personal data, the types of personal data we will process and hold about you, and for how long we will keep the data before destroying it. This guide also provides a summary of your legal rights as a data subject, information about any third party organisations which we may share your data with or may share data with us about you. Finally, this guide provides information about potential data transfers to other countries and the safeguards the Society ensures are in place. A more detailed Privacy Notice is available on the Society's website www.theprogressive.com.

Purpose and basis for processing your personal data

We collect and store information from you to help manage your accounts and to provide a service to you. This information is collected in various ways, including:

- In applications forms, email and letters, telephone calls and conversations in branch;
- Through the Society's website, during mortgage and savings reviews and interviews;
- Information the Society receives from other organisations such as credit reference agencies and fraud prevention agencies;
- From your professional financial or legal representatives.

We use your information in a number of ways, for example:

- To administer and maintain your accounts;
- Crime detection, prevention and prosecution which includes checking your identity;
- Disclosing information to regulatory authorities in response to formal requests;
- Disclosing information about you to the Society's legal representatives for the purpose of collecting your debts to the Society;
- Assessing lending applications and propositions.

The Society will rely on any of the following legal basis for processing your personal data:

- The processing is necessary for the performance of a contract with you or to take steps to enter into a contract;
- The processing is necessary for compliance with a legal obligation;
- The processing is necessary for the purposes of legitimate interests pursued by us or a third party.

The Society will seek your verifiable consent in respect to receiving marketing material. The Society does not share or give any information to external companies for their own marketing purposes.

Should you not provide the Society with the personal data it legitimately requests it may not be possible to transact business with you.

Categories of Personal Data

Personal Data

Examples of the personal data the Society holds about you include:

- personal information, such as your name, address and date of birth;
- personal information provided by you in support of a mortgage application – e.g. employment details and bank account details;
- details of your credit record;
- personal details provided by you when opening a savings account – e.g. bank account;
- details about you proving your identity.

Sensitive Personal Data

In some circumstances you may wish to provide us with sensitive personal data, such as health information, to enable us to help you access and manage your accounts. Where possible we will ask for your consent, but if you write to us we will assume you are happy for us to record the information unless you tell us not to.

Recipients of your personal data

Information about you and any products you hold with us may be used **within the Society** for all purposes necessary for performing our contract with you and for example in:

- making lending decisions;
- tracing debtors and collecting debts;
- assisting in verifying your identity;
- assessing risks;
- legal and regulatory compliance;
- preventing or detecting financial crime.

The Society may disclose your personal information to **other organisations**, for example where:

- The processing is necessary for the performance of a contract with you or to take steps to enter into a contract;
- The processing is necessary for compliance with a legal obligation;
- The processing is necessary for the purposes of legitimate interests pursued by us or a third party;
- We have your consent;
- For the purpose of verifying information you have given us for example verifying your income when assessing you for credit;
- For the purposes of improving our products, services and marketing communications, with specialist market research organisations who may contact you on our behalf

The Society may carry out additional fraud prevention checks using fraud prevention database services provided by third party organisations. If false or inaccurate information is provided, and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies and government agencies may access and use this information.

We and 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, such as additional loans;
- managing credit and credit related accounts or facilities;
- recovering debt;
- checking details on proposals and claims for all types of insurance;
- checking details of job applicants and employees.

Transfers to third country and safeguards

The Society and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

We (and our service providers) may process personal information outside of the UK for our legitimate purposes. We will ensure that it is secure and protected from unauthorised access. Where personal information is processed in countries that do not have the same level of legislation protecting information as the UK we will ensure your information is protected to the same level as the UK.

Retention period

We will keep your information as long as permitted for our legitimate business purposes and for any retention period that we are legally required to meet. Our current practise is not to hold customer personal data beyond 10 years after a mortgage account relationship has ended or 6 years after a savings account relationship has ended. Personal data which the Society considers to be of less relevance to the performance of a contract, such as miscellaneous correspondence or telephony records, may be deleted earlier.

Your data protection rights

- 1. Your right to be informed:** This Privacy Notice provides you with information on the purpose for collecting and use of your personal data. More information can be found on our website.
- 2. Your right of access:** You have the right to obtain confirmation that your personal data is being processed, have access to your personal data; and other supplementary information – (as provided in this privacy notice). Accordingly, the Society will provide details of the information we hold about you on request.
- 3. Your right to rectification:** The Society will rectify any personal data that is inaccurate or incomplete. If any inaccurate personal data has been disclosed to third parties, the Society will inform them of the rectification where possible.
- 4. Your right to erasure:** You have a right to have personal data erased and to prevent processing in specific circumstances. For example:
 - Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
 - When you withdraw consent.
 - When you object to the processing and there is no overriding legitimate interest for continuing the processing

5. The right to restrict processing: You can require the Society to restrict the processing of your personal data, for example:

- Where you contest the accuracy of the personal data, the Society will restrict the processing until the accuracy of the personal data has been verified.
- Where you have objected to the processing and the Society is considering whether its legitimate grounds override your rights.

6. The right to data portability: This allows you to obtain and re-use your personal data for your own purposes across different services. The right to data portability only applies: to personal data you have provided to us, where the processing is based on your consent or for the performance of a contract and when processing is carried out by automated means.

7. The right to object: You have the right to object to, for example:

- Processing of your data based on legitimate interests;
- Direct marketing (including profiling)
- An objection on grounds relating to your particular situation.

8. Rights in relation to automated decision making and profiling: You have the right not to be subject to a decision when it is based on automated processing where it produces a legal effect or a similarly significant effect on you.

Contact Details

Progressive Building Society

Data Protection Officer
Progressive Building Society
33-37 Wellington Place
Belfast
BT1 6HH

Telephone: 028 9024 4926
Website: www.theprogressive.com

The Society has an internal complaints procedure. Complaints that we cannot resolve may be referred to the Financial Ombudsman Service.

The Information Commissioner

If you wish to know more about your rights in respect of protection of personal data, you should write to the:

Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow
Cheshire
SK9 5AF

Or telephone: 0303 123 1113
01625 545745

Website: www.ico.org.uk
E-mail: mail@ico.gsi.gov.uk