

Customer Privacy Notice

(Use of personal information)

Information about us

Vida Bank Limited trading as Vida Savings ("Vida Savings", "we" or "us") is a data controller and gathers and uses information about you. Details of our notification to the regulator for data protection may be found in the Information Commissioner's Office Public Register of Data Controllers at www.ico.org.uk under registration number ZA161427.

The www.vidasaving.co.uk website and its webpages (the "Site") are also operated by Vida Bank Limited, whose registered office is at 1 Battle Bridge Lane, London, SEI 2HP.

If you require any further information, please contact our Data Protection Officer:

The Data Protection Officer

Vida Bank Limited

1 Battle Bridge Lane, London, SE1 2HP

Email: dataprotectionoffice@vidabank.co.uk

Phone: 0345 646 0460

Key summary

This is our 'Privacy Notice'. It is referred to in the terms and conditions governing any account with us as the 'Use of Information Statement'. The purpose of the Privacy Notice (or Use of Information Statement) ("the Notice") is to set out the purposes for which, and the manner in which, we may collect and use personal information that we may obtain about you. We collect data about you when you use our services.

The UK General Data Protection Regulation requires Vida Savings to manage personal information in accordance with the General Data Protection Regulation (UK GDPR) Principles. In particular, Vida Savings is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require.

All our employees are personally responsible for maintaining customer confidentiality. We provide training to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you, we will inform you of any changes before they take effect.

Who this Notice covers

This Notice explains how we will use the personal data of:

- anyone who applies for, or has a savings account with us;
- anyone who becomes, or applies to be added as a party to an existing savings account, and
- representatives of anyone who has a savings account with us including persons appointed under a Power of Attorney and personal representatives.

Each such person is referred to as "you" and "your" in this privacy notice.

Fair processing notice

When you apply to us for a savings account, we will check records about you.

We will check the following types of records:

- Our own records and those of Vida Bank Limited group companies
- Those at fraud prevention agencies. We will make checks such as: verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at credit reference agencies and fraud prevention agencies to manage your account with us.
- We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. From time to time, service providers and organisations with whom we work to provide services to you, or credit reference agencies with which we work, may be located outside the UK or European Economic Area in countries that do not have the same standards of protection for personal data as the UK. We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal data.

We may use your information and/or personal data when considering your savings account application for the purposes of conducting market research and statistical analysis, estimating product sales, for purposes of preventing fraud and money laundering. For certain purposes, we may share your information with third parties, such as service providers or governmental bodies. This may include, but is not limited to, meeting our contractual reporting obligations or to service your account.

Your information and/or personal data may also be used for other purposes for which you give your specific per mission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 2018.

Vida Savings is a trading style of Vida Bank Limited. Your information and/or personal data will be shared therefore with Vida Bank Limited group companies both now and in the future as we develop as a business.

The type of personal information we collect

We may process a wide variety of personal data about you, where necessary, including data about:

Information about your identity and contact details	Including name, title, address (including previous names and addresses), other contact details including email addresses and telephone numbers, gender, date of birth, memorable information, marital status, nationality, countries of which you are a citizen or resident in, National Insurance Number, Tax Identification Numbers, employment and employment history, originals or copies of identification documents like passport, birth certificate or driving licence.
Information about people connected to you	Including persons appointed under a Power of Attorney and personal representatives.
Information about accounts, products and services you have with us	Including your account number(s), account terms, balances, payments to and from your savings account.
Your financial details	The details of bank accounts from which, or to which, payments are sent, details of savings accounts you have with other banks and building societies (e.g. ISAs) including the name of the provider, account/reference number, sort code and balances, details of investments held within an ISA (description of investment, investment indicator, number and value).
Information about your employment	Your employment status, your salary and other forms of income.
Information about any other checks we are required by regulations to carry out	Including criminal convictions, whether you are a Politically Exposed Person and/or subject to financial sanctions.
Communications	Correspondence or communications received or sent and the information contained within them.
Information about your preferences	Including whether you wish to receive marketing from us, or prefer documents in large print or other alternative formats.

Technology information	Including how you access and use our website, device identifiers including IP addresses, location and device information.
Information about your profile and how you use our products and services	Including details of your products and services with us, including how you access and use those products and services, how we have grouped you with other types of customers.
Other information identifying you	Other information identifying you including password, memorable date, memorable name, memorable place, unique identifiers and references numbers we have allocated to you (like Companies House references, account numbers, online usernames).

Special category data

Special category data is personal information that requires more protection due to its sensitive nature for example about your health, racial or ethnic origin. We will only collect this information if required by law or where we have your consent. For example, we may ask for and record information about your health when required for the management of your account, or if your circumstances may lead you to be financially or otherwise vulnerable. You are not contractually required to provide this information, and where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time.

What is the legal basis for our use of your information?

Where we use your personal information, we must have a legal basis that justifies our use of your information. There are a number of legal bases under which we process your data:

Contract	For the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you, to fulfil our contractual obligations to you or because you have asked us to do something before entering into a contract
Legal obligation	To comply with our legal and regulatory obligations
Consent	If you have consented to us processing personal data for one or more specified purposes
Legitimate Interests	 This means the purpose is essential or relevant to our business. The legitimate interests we have for processing your personal data include to: administer and manage your savings account and services relating to that, updating your records, tracing your whereabouts to contact you about your account comply with our legal and contractual obligations, best practice and codes of practice exercise our legal rights prevent financial and other crime to adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service, the Information Commissioner's Office and under the Financial Services Compensation Scheme for management and audit of our business operations including accounting to carry out monitoring and to keep records meet your expectations of us enhance and develop the products and services we provide to you develop and improve our business, products and services and the terms which apply to them undertake analysis, modelling and forecasting manage and mitigate the risks to you and our business keep our records up to date and to enable us to link your different accounts with us together verify the information provided to us to ensure its accuracy be efficient in running our business, providing our products and services, fulfilling our legal obligations contact existing customers about other products and services we offer ensure our business is profitable and has adequate levels of capital and funding, or facilitate investment in, and the growth of, our business

How we receive personal data

Vida Savings collects personal data about you from a variety of sources including:

- from you directly or other linked applicants or account holders
- persons who represent or advise you including a person appointed under a Power of Attorney
- your bank or building society
- fraud reference agencies
- the Cash ISA Transfer Service
- persons working on our behalf and providing us services
- market researchers
- local and national government, tax and law enforcement agencies
- other companies within the Vida Bank Limited group
- publicly available information such as from the Electoral Register, and internet searches

We will also create personal data about you during the course of the application for the administration of your savings account, including emails, telephone calls, letters and other documents.

How do we share your personal information

We may give information about you to the following companies and organisations who may use it for the same purposes as set out above:

- to other companies in the Vida Bank Limited group, to our employees and agents or other approved third parties to administer any accounts or provide services to you on our behalf
- to approved third parties who provide services to you upon our request, including sending communications to you on our behalf
- to you, your representatives and advisers including persons appointed under a Power of Attorney and personal representatives
- parties to the savings account
- any other person you ask us to provide information to
- our clearing bank
- your bank and building society
- banks and building societies from which payments are sent or received
- to agents who (on our behalf) profile your data so that we may tailor goods/services to meet your specific needs
- to anyone to whom we transfer our rights and duties under our agreement with you
- our bank, BACS and the Direct Debit Scheme, the Cash ISA Transfer Service
- organisations engaged in the process of making or receiving payments
- central and local government
- the Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us
- statutory and regulatory bodies including tax authorities, HMRC, Financial Services Compensation Scheme, Reclaim Fund Ltd, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, Bank of England and any relevant international regulators
- credit reference and fraud reference agencies
- law enforcement agencies
- market research companies
- any investor, potential investor, funder, purchaser in or of our business or any part of our business and their advisers

- anyone to whom we transfer our rights and duties under your Agreement with us, together with their advisers
- a potential purchaser of our business or any part of it is sold
- any business with which we are seeking to merge and their advisers
- to anyone we have a legal or regulatory duty to do so or if the law allows us to do so

How we use your information

We use your personal information in the ways listed below.

How we use your personal information to make automated decisions

In order to make our processes as efficient and fair as possible we will at times make an automated decision.

To process your application for a savings account, to administer and provide the savings account and other products and services you have or apply for with us	 Including to: check your identity, address and other information provided to us about you manage our relationship with you contact you about your account and responding to queries make and receive payments and to ensure payments received and sent are allocated to the correct account and beneficiary manage fees, charges and interest due or payable locate you if we reasonably believe you are no longer living at the most recent address we have for you link the savings account to other products and services you have with us create records, produce correspondence and other documents, and to provide information to you and other persons identify circumstances which may make you vulnerable so that we can take account of this in our dealings with you update, consolidate and improve the accuracy of our records monitor and analyse the use of your account with us identify other products and services you may be interested in and to tell you about other products and services consider any future applications you make tell you about products and services offered by us and those of third parties which we think may be of interest to you considering requests, you and other persons make of us to decide whether we will agree to the request being made or provide the information requested correct inaccurate data held by us and third parties, updating, consolidating and improving the accuracy of our records monitoring and analysing the performance of your account with us
To identify and prevent financial crime	 Including to: detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime
To comply with our legal, contractual and regulatory obligations as well as codes of conduct and to run our business	 Including to: share data about you and your accounts with us with: our regulators, the Bank of England, the Financial Services Compensation Scheme and ratings agencies; our investors or potential investors, funders and their advisers any prospective purchaser of us, seller to us or party seeking to merge with us or any person who does or wishes to fund or otherwise be involved in any such transaction and their representatives credit reference and fraud prevention agencies who in turn will provide data to us identify if you, a close associate or relative are subject to financial sanctions, or are considered Politically Exposed provide data, reports and returns to our regulators, HMRC, UK and overseas tax authorities, Reclaim Fund Ltd, statutory or trade bodies provide data when required by a court order or other legal or contractual obligation manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing manage our savings accounts and use our resources manage risk for us and our customers seek advice from our advisers

	 paying fees to the introducers of business to us and to provide them with management information on the performance of their business complying with any other legal obligation imposed on us, including where you have sought to exercise your legal rights
To develop and improve our products and services	Including to: • test products and services • obtain your feedback on the products and services we provide • undertake market research • ensure that we meet high standards of customer service, including monitoring calls and training staff • to help us ensure that we provide you with the right information and offer you relevant services
To undertake analysis, produce models, statistics, reports and forecasts	Including to: • predict your economic situation and/or future behaviour • analyse and model the likely future performance of you and other future savers with us
To investigate and respond to complaints, disputes and where necessary to bring and defend legal claims	 Including to: identify and document facts and evidence investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services

The type of automated decisions we make may include:

- checking whether you meet the conditions required to open the account you have applied for
- checking your identitycreating a profile of you
- creating a profile of you
- deciding whether we will offer additional products and services or the opportunity to vary existing products or services and the terms of any such products, services or variation

These automated decisions may also take into account details of any products you already have with Vida Savings and any assessment of your financial status and risks we have undertaken.

You may ask us not to make automated decisions about you by contacting our Data Protection Officer or ask us to review any automated decision that we have made taking account of any additional information you wish to provide to us.

Checks that we carry out and use of your personal information by credit reference and fraud prevention agencies

When you apply to us for a savings account, we will check records about you to help us prevent fraud and money laundering, and to verify your identity. We may also make periodic searches at credit reference agencies and fraud prevention agencies to manage your account with us.

We will check the following types of records:

- our own records obtained via account administration, both current and in the future
- records that credit reference agencies supply to us both public information (including the electoral register) and shared credit and fraud prevention information; and those at fraud prevention agencies.

Credit Reference Checks

When you apply to us for a savings account, we will perform identity checks on you with one or more credit reference agencies. To do this we supply the credit reference agencies with personal information about you.

If you are applying for a joint savings account we will link your records together so you must be sure that you have their agreement to disclose information about them. Credit reference agencies also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the credit reference agencies to break that link. You must provide this notice to such financial associates prior to commencing the application process with us.

We will continue to exchange information about you with credit reference agencies and routinely perform identity checks while you have a relationship with us. When credit reference agencies receive an identity search from us they will place a search footprint on your credit file that may be seen by other firms. Records remain on file for 6 years after they are closed.

A joint document has been created by the credit reference agencies known as Credit Reference Agency Information Notice (CRAIN) which explains their role, the data they hold and the ways in which they use and share that data. For full details on how credit account information sharing is conducted by credit reference agencies and to view their full Fair Processing Notice please visit or contact:

Equifax - www.equifax.co.uk/crain

Customer Service Centre, PO Box 10036, Leicester, LE3 4FS

Telephone: 0800 014 2955

Website: <u>www.equifax.co.uk</u>

Experian - www.experian.co.uk/crain/index.html

Consumer Help Service, PO Box 9000, Nottingham, NG80 7WF

Telephone: 0344 481 8000/0344 481 8000

Website: www.experian.co.uk

Transunion - www.transunion.co.uk/legal/crain-retention

Consumer Services Team, PO Box 491, Leeds LS3 1WZ

Telephone: 0330 024 7574

Website: www.transunion.co.uk

Fraud Prevention Agencies

Before we provide services to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity. Details of the personal information that will be processed include, for example:

- name
- date of birth
- residential address and address history
- contact details such as email address and telephone numbers
- financial information
- identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services you have requested.

We, and fraud prevention agencies, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.

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

To find out more about our fraud prevention agencies and how they manage your information, visit each agency directly:

- CIFAS cifas.org.uk/fpn
- National Hunter nhunter.co.uk/privacypolicy
- Synectics Solutions Ltd synectics-solutions.com/privacy
- BioCatch biocatch.com/privacy-policy
- LexisNexis (ThreatMetrix) risk.lexisnexis.com/group/privacypolicy

Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

Consequences of processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and products you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

Data transfers

Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

If you choose not to give us personal data

In order for us to consider your application for a savings account or to administer your account you will need to provide us with the personal data we request.

If you don't give us the information, we request then it may prevent us from being able to respond to your request or open and administer an account. It may also affect our ability to meet our contractual or legal obligations.

Where we store your data and for how long

All information you provide to us is stored on secure servers. Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer. How long we keep your information for depends on what products and services you have with us. We won't keep it any longer than we need to.

This means we'll continue to hold some info for a while after your account has closed or our relationship has ended. For example, where we need to for the regulator, for active or potential legal proceedings, to resolve or defend claims or for making remediation payments.

If you'd like more information on how long we store your data, you can contact our Data Protection Officer.

We will usually keep your personal data for 7 years from the later of the date of your application or the date you cease to have any accounts with us. This is subject to our obligations to comply with the record retention requirements under the Data Protection legislation. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

Where you have agreed to receive our marketing communications, we will keep your contact information on an on-going basis whilst we are actively communicating with you or until you ask us to stop sending you marketing communications.

Your data protection rights

You have a number of rights in relation to your information:

1. The right to be informed

You have the right to be informed about the collection and use of your personal data. You must be provided with information including: the purposes for processing your personal data, the retention periods for that personal data, and who it will be shared with. This information is provided within this Notice.

2. The right of access

You have the right to access your personal data. The right of access allows you to be aware of and verify the lawfulness of the processing. You have the right to obtain confirmation that your data is being processed, access to your personal data and other supplementary information.

3. The right to rectification

The UK GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing.

4. The right to erasure

The UK GDPR introduces a right for individuals to have personal data erased. You can make a request for erasure verbally or in writing. The right is not absolute and only applies in certain circumstances.

The right to erasure does not apply if processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation;
- for the performance of a task carried out in the public interest or in the exercise of official authority;
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
- for the establishment, exercise or defence of legal claims.

5. The right to restrict processing

You have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. You can make a request for restriction verbally or in writing.

6. The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- direct marketing (including profiling)
- processing for purposes of scientific/historical research and statistics.

For more information, or to exercise your data protection rights, or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

Access to information

Each time you visit our site we may automatically collect the following information:

- technical information, including the internet protocol (IP) address the request came from or the one your Internet service provider assigned to you
- browser type and version
- device type
- operating system and version
- your user locale (your default preferences for dates, times, numbers etc)
- the URL where you were referred from
- any phone number used to call our customer service number.

Cookies

Our website uses cookies. For detailed information on all the cookies we use and the purposes for which we use them please see our <u>Cookie policy</u>.

Disclosure of your information

We will treat your personal information as private and confidential, but may share it with other companies in the Vida Bank Limited group and disclose it outside of Vida Bank Limited if:

- a. allowed by this agreement;
- b. you consent;
- c. needed by our agents,
- d. needed by subcontractors to help us manage your records;
- e. HM Revenue & Customs or other authorities require it;
- f. the law, regulatory bodies (including for research purposes), or the public interest permits or requires it;
- g. required by us or others to investigate or prevent crime;
- h. needed by market research companies to assist us in providing better products and services for you;
- i. needed by any other parties connected with your account (including Power of Attorney); or
- j. required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).

We will always ensure your information remains safe and secure.

The Government also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

Marketing

We will ask you, when you provide us with your personal data, if you are happy for us to contact you by telephone, post, email or SMS about products and services offered by us and those of third parties which we think may be of interest to you. If you do not agree to this, we will not use your personal data for these purposes.

If, at any time, you change your preferences and either do wish to receive such communications or wish us to stop sending you such communications you can let us know by one of the following methods:

- online banking portal
- phone
- post
- secured message

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

We may use your information and/or personal data when considering your savings application for the purposes of conducting market research and statistical analysis, estimating product sales, for purposes of preventing fraud and money laundering. Please note that information may be shared with third parties for account administration (such as contact management) and to meet Vida Savings' contractual reporting obligations.

Call recording

We may record and monitor telephone calls with you for the following purposes:

- for security, quality and/or training purposes;
- to confirm that we have complied with your instructions;
- to resolve or investigate any queries;
- to comply with our legal obligations, or
- to prevent fraud or other criminal activities.

Information we collect about you

If for any reason you are unsure about the personal and account information we are holding in your name, please contact us. We will happily review your file and update the records if required. You have the right to ask us to correct incorrect data which we may hold about you. You also have the right to obtain a copy of the information held by us about you.

For more information or to exercise your data protection rights or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

How to complain

If you have any complaints about the way we use your personal information please contact our Complaints team via:

Post: Freepost VIDA SAVINGS

Email: <u>enquiries@secure.vidasavings.co.uk</u>

Phone: 0345 6460 460

If we cannot resolve any issue, you have the right to complain to the Information Commissioner:

Information Commissioner's Office

Wycliffe House

Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: ico.org.uk

Useful links

Vida Cookies Policy

Please note that you can contact credit reference agencies for any data you believe to be incorrect and/or to log a notice of correction. For more information about how Credit Reference Agencies operate and how they use your information is available at:

Experian: <u>www.experian.co.uk/privacy</u>

TransUnion: transunion.co.uk/legal/privacy-centre

Equifax: www.equifax.co.uk/About-us/Privacy_policy.html

ICO

ICO website: ico.org.uk

ICO guidance for back up retention: ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/ individual-rights/right-to-erasure/

National Hunter

National Hunter, PO Box 4744, Stone, ST15 9FE

nhunter.co.uk

Credit Industry Fraud Avoidance System: www.cifas.org.uk/fpn