

This document (our '**Privacy Statement**') sets out how we (Hampden & Co plc) use your personal data and what rights you have in relation to this. We recommend that you keep a copy of this Privacy Statement.

If you access our services through our websites, then you should also read our 'Website Privacy Notice' at **www.hampdenandco.com** and/or **www.hampdendigital.com**

Our sites use cookies and other device identification technologies ('cookies') to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our website, to understand how our sites are used, to understand the online behaviours and interests of our visitors and service users, and to improve our sites. For detailed information on the cookies we use and the purposes for which we use them please see our 'Cookie Policies' at **www.hampdenandco.com** and **www.hampdendigital.com**

1. WHAT PERSONAL INFORMATION DO WE COLLECT?

We may hold the following personal information about you and use it as we describe in section 3:

- your name, address, telephone numbers, email address(es), date of birth, place of birth, nationality, tax/residency status, passport, employment, banking and financial details;
- demographic and lifestyle information;
- information we receive when making a decision about you, your loan or your application for such a loan;
- information that you provide by completing forms that we provide to you;
- information we obtain from running your accounts;
- information we obtain when you use our online services;
- details of the loan(s) you have and have had with us and all transactions;
- Closed circuit television (CCTV) in branches;
- details of when you contact us and when we contact you (e.g. copies of any correspondence and recordings of telephone calls); and/or
- details of how you applied for your loan, together with any other information (including where obtained from third parties) which we reasonably need to operate your account, make decisions about you or fulfil our regulatory obligations.

You may also provide us with information about other people connected to you (such as your dependents, joint account holders or business and/or financial associates). Please ensure that you know they agree, or that you are otherwise allowed to give us this information, and direct them to our Privacy Statement online. We will tell them you have provided this information and we will provide them with a copy of this Privacy Statement.

Special Categories of Personal Data

During our banking relationship with you, you may disclose to us personal information about you, your family, and your business and/or financial associates which is sensitive or intrinsically private. This includes in areas such as health, your political, religious, sexual or philosophical beliefs, or race and ethnic origin. This is known as Special Categories of Personal Data. If you disclose such information to us, we will only record this where we believe this helps us to understand your circumstances and to improve our personal relationship with you. There is no expectation from us that you need to provide such information. Please indicate below if you consent to this:

I provide my consent for Hampden & Co to hold and process Special Categories of Personal Data for the purposes described in this section.

Yes No

You can withdraw your consent at any time by writing, emailing or telephoning us using the contact details given in the final section below.

2. WHAT SOURCES DO WE USE?

We may obtain personal information about you from a variety of sources, including:

- you;
- your family;
- your employer (where we need relevant information to support a lending application);
- people who have introduced you to us;
- your business and/or financial associates;
- identification and verification agencies;
- credit reference agencies;
- fraud prevention agencies;
- the electoral register;
- Companies House.

Where we have obtained data from a person other than yourself, and/or the source is not listed above, we will inform you of this where appropriate.

3. HOW DO WE USE YOUR PERSONAL INFORMATION?

We will process the information we collect about you to allow us to enter into and perform a contract with you, to meet our legal and regulatory obligations, for the purpose of our legitimate interests (as detailed at the end of section 4) and where you have given us your consent. We will use it:

- to process and complete your requests and/or applications for accounts and/or services;
- for security and ID verification;
- to process payments;
- to detect and prevent criminal activity and fraudulent transactions;
- to update our records and maintain your account(s) with us;
- to make decisions about your eligibility for our accounts and/or services;
- to develop and improve our accounts and/or services;
- to protect ourselves against harm to our rights and property interests;
- to provide specific information to our regulators and other government bodies to adhere to our regulatory, legal and compliance obligations; and/or
- to send you marketing messages (about our or a third party's products and/or services) where you have provided your consent to us below.

Marketing messages

We would like to send you information about our products and services which we think may be of interest to you. We may do this by letter, email, text, or other digital channels. Please indicate your consent to receiving this information by ticking the appropriate box:

Yes No

Occasionally we would like to send you information from select organisations which we think may be of interest to you. We may do this by letter, email, text, or other digital channels. Please indicate your consent to receiving this information by ticking the appropriate box:

Yes No

You can withdraw your consents at any time by writing, emailing or telephoning us using the contact details given in the final section below.

4. WHEN IS YOUR PERSONAL INFORMATION DISCLOSED AND WHO DO WE DISCLOSE IT TO?

People who support services we provide

- to third parties who are bound to keep such information secure and confidential, such as our suppliers, contractors, agents, and business partners (and their sub-contractors) who help us provide our services to you;
- to payment-processing service providers;
- to organisations or agencies who host or maintain data centres, service platforms and other infrastructure and systems on our behalf, where your personal information is processed and/or stored; or
- to our professional advisers.

People we have obligations to give it to

- to UK and overseas regulators and authorities in connection with their duties;
- when we are required to do so 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);
- when we are required to comply with (i) a court order, (ii) a request from a law enforcement agency or (iii) other legal obligations;
- when there is a public duty to disclose information;
- to comply with anti-money laundering legislation;
- when it is necessary to prevent bribery, fraud, terrorist financing and money laundering;
- to meet our obligations under the sanctions compliance regime;
- to reduce credit risk or recover any money you owe to us;

4. **WHEN IS YOUR PERSONAL INFORMATION DISCLOSED AND WHO DO WE DISCLOSE IT TO?** (continued)

- when we may be required to share information about your accounts with the UK or relevant tax authorities, either directly or via the local tax authority who may share that information with the appropriate tax authorities abroad.

People you want us to give it to

- to your advisers (such as accountants, lawyers, financial or other professional advisers) if you have authorised anyone like this to represent you, or any other person you have told us is authorised to give instructions or to use the account or services on your behalf (such as an attorney under a power of attorney);
- to a guarantor, where appropriate;
- when you have provided consent.

Our legitimate interests

- in the event that we sell or buy any of our business or assets, in which case we may disclose your personal information (as a client) to the prospective seller or buyer of such business or assets, or to anyone funding the sale or purchase of such business or assets regardless of whether the sale or purchase is completed;
- to protect our rights, property, or safety of our employees, clients or others including in order to enforce our terms of use and other agreements;

5. **HOW DO WE WORK WITH IDENTITY VERIFICATION AGENCIES, FRAUD PREVENTION AGENCIES AND CREDIT REFERENCE AGENCIES?**

Identity Verification Agencies

We may perform searches about you using Identity Verification Agencies who supply us with identity information, as well as information about you from the Electoral Register, in order to verify your identity. Our search is not seen or used by lenders to assess your ability to obtain credit but a record is retained by the agency whether or not your application to become a client proceeds.

Fraud Prevention Agencies

The personal information we have collected about you will be shared with Fraud Prevention Agencies (FPAs) who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these FPAs, and your data protection rights, can be found under Fair Processing Notice in the Downloads section of our website at www.hampdenandco.com.

You can contact us if you want to receive details of the relevant FPAs we use.

Credit Reference Agencies

In order to process your application, we will perform credit and identity checks on you with one or more credit reference agencies ("CRAs"). Where you take banking services from us we may also make periodic searches at CRAs to manage your account with us.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);

5. HOW DO WE WORK WITH IDENTITY VERIFICATION AGENCIES, FRAUD PREVENTION AGENCIES AND CREDIT REFERENCE AGENCIES? (continued)

- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We will continue to exchange information about you with CRAs while you have a relationship with us. We will also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will 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 CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in the Downloads section of our website at www.hampdenandco.com under Credit Reference Agency Information Notice (CRAIN). CRAIN is also accessible from each of the three CRAs – clicking on any of these three links will also take you to the same CRAIN document:

TransUnion – www.transunion.co.uk/crain;

Equifax – www.equifax.co.uk/crain;

Experian – www.experian.co.uk/crain

You can also contact the main CRAs currently operating in the UK so that you can get a copy of the personal information that they hold about you. The information they hold may not be the same so it is worth contacting them all. They may charge you a small statutory fee.

CREDIT REFERENCE AGENCY	CONTACT DETAILS
TransUnion International UK Limited	<p>Post TransUnion, One Park Lane, Leeds, West Yorkshire, LS3 1EP</p> <p>Web Address https://www.transunion.co.uk/consumer/consumerenquiries</p> <p>Email consumer@transunion.com</p> <p>Phone 0330 024 7574</p>
Equifax Limited	<p>Post Equifax Limited, Customer Service Centre PO Box 10036, Leicester, LE3 4FS</p> <p>Web Address https://www.equifax.co.uk/Contactus/Contact_Us_Personal_Solutions.html</p> <p>Email UKDPO@equifax.com</p> <p>Phone 0333 321 4043 or 0800 014 2955</p>
Experian Limited	<p>Post Experian, PO BOX 9000, Nottingham, NG80 7WP</p> <p>Web Address http://www.experian.co.uk/consumer/contactus/index.html</p> <p>Phone 0344 481 0800 or 0800 013 8888</p>

6. TRANSFERRING YOUR DATA OUTSIDE OF THE UK

We, our payment agency or third parties acting on our behalf, may transfer your personal information outside the United Kingdom (UK). We will protect your personal information in accordance with the standards set out under the UK GDPR. We do this by including strong undertakings in the contracts we put in place with those relevant parties.

Additionally, we and other organisations we work with may access and use information recorded by fraud prevention agencies from other countries.

7. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

Once your relationship with us ends, we will keep your information for a period of at least 6 years thereafter, or longer if required by law or regulation.

If your application for an account or service is declined or you decide not to go ahead before becoming our client, we will keep your information for no longer than a period of 6 months.

8. YOUR RIGHTS

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent
- You have validly objected to our use of your personal information – see Objecting to how we may use your information below
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to require us to stop using your personal information for direct marketing purposes.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Automated processing – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.

9. CONTACTING US

You may contact us, as the data controller, at Hampden & Co plc, 9 Charlotte Square, Edinburgh, Scotland, EH2 4DR or by email at contact@hampdenandco.com, or by calling us on 0131 226 7300. You can also use these details to withdraw any of the above consents you have given us.

Our Data Protection Officer can also be contacted using these same details, or by email at dpo@hampdenandco.com

We aim to address all queries and resolve all complaints internally via our complaints handling process and our DPO, but you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.