

Group Privacy Notice

1. Introduction

- 1.1 At The Cumberland Group, your privacy is really important to us and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on our relationship with you and, if you are a customer, the products and services we provide to you.
- 1.2 This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We will update this Privacy Notice if we make any significant changes affecting how we use your personal information, and if so we will contact you to let you know about the change.

2. About us

- 2.1 We are the 'data controller' of personal information we gather and use. When we say 'we' or 'us' in this Privacy Notice, we mean Cumberland Building Society. Cumberland Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Financial Services Register No. 106074). Credit facilities other than regulated mortgages and regulated credit agreements are not regulated by the Financial Conduct Authority.
- 2.2 Cumberland Building Society has trading companies, which provide specific types of products and services. When we say 'Group', we mean these companies too. If you are a customer of one of these companies, when we say 'we' or 'us' we mean that company instead. Our group companies are:
 - Cumberland Estate Agents Limited (trading as Cumberland Sales & Lettings) (Company No. 02348222), which provides sales and letting services;
 - Borderway Finance Limited (Company No. 03048466), which provides vehicle finance products and services. Borderway Finance Limited is regulated by the Financial Conduct Authority (Financial Services Register No. 670091);
 - Cumberland Financial Services Limited (Company No. 02332657), which provides independent financial advice. Cumberland Financial Services Limited is regulated by the Financial Conduct Authority (Financial Services Register No. 200391) and is an appointed representative of TenetConnect Services Limited.

3. How to contact us about your personal information

3.1 Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by:

- emailing us at help@cumberland.co.uk;
- calling us on 01228 403141;
- visiting any Cumberland branch; or
- writing to us at Cumberland Building Society, FREEPOST, Cumberland House, Cooper Way, Parkhouse, Carlisle, CA3 0JF..

It would help us deal with your request if you let us know, which of our group companies you are contacting us about. We will update your preferences as soon as possible.

3.2 In relation to all other matters (including exercising any of your other privacy rights set out in Section 4), you can contact our Data Protection Officer (DPO), who makes sure we look after your personal information properly. Our DPO can be contacted by:

- emailing DPO@cumberland.co.uk;
- calling 01228 403141; or
- writing to Group Data Protection Officer, Cumberland Building Society, Cumberland House, Cooper Way, Parkhouse, Carlisle, CA3 0JF.

3.3 If you are exercising any of your privacy rights, please make requests in writing, and provide us with evidence of your identity. It helps us to deal with your request if you can also provide your:

- full name;
- date of birth; and
- address and postcode.

4. Your Privacy Rights

4.1 You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else.

4.2 You can make a request to exercise any of your rights in this Privacy Notice free of charge by contacting a local branch or our DPO. We will respond to your requests in accordance with our obligations under data protection law.

4.3 You can make a complaint about how we have used your personal information to us, by visiting your local branch or by contacting our DPO. You can also make a complaint to a supervisory authority – in the UK, this is the Information Commissioner’s Office. Visit their website at <https://ico.org.uk/concerns/>.

More about your Privacy Rights

- 4.4 **Right to object:** Where we are processing your personal information for direct marketing purposes or on the basis of a legitimate interest, you can object to our processing of your personal information, by contacting our DPO with details of your objection.
- 4.5 **Access to your personal information:** You can request access to a copy of your personal information that we hold, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for, whether it has been used for any automated decision making and, where we obtained it from someone other than you, where we obtained it from.
- 4.6 **Right to withdraw consent:** If you have given us your consent to use personal information, you can withdraw your consent at any time and, update your marketing preferences.
- 4.7 **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- 4.8 **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- 4.9 **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- 4.10 **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

5. Personal information we collect from you

- 5.1 If you are a customer, we obtain personal information:
- directly from you, for example when you fill out an application; and
 - by observing how you use our products and services, or those of other members of our Group, for example from the transactions and operation of your accounts and services.
- 5.2 We may also collect more limited information from you before you become a customer, when you are considering or applying for our products and services.
- 5.3 Sometimes where we ask for your personal information needed to enter into a contract with you or to meet a legal obligation (such as a credit check), we will not be able to provide some products or services without that personal information.
- 5.4 If you are not a customer or a prospective customer, the personal information we collect from you will depend on the type of relationship you have with us. This may be as a guarantor or referee or as the occupier, tenant or purchaser of a property or as the dependent of a customer.
- 5.5 We also may obtain some personal information from monitoring or recording calls and when we use CCTV. We will record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve queries or issues.

5.6 We use a variety of personal information depending on the products and services we deliver to you or the type of relationship we have with you. We categorise these information into broad types.

Further information about how we categorise the personal information our Group collects from you

Personal	Contact	Product
<ul style="list-style-type: none"> • Name • Previous Names • Date of Birth • Nationality • NI Number • Marital Status 	<ul style="list-style-type: none"> • Address • Email Address • Telephone Numbers 	<ul style="list-style-type: none"> • Application Forms • Correspondence • Contracts

Transactional	Documentary	Financial
<ul style="list-style-type: none"> • Account Transactions • Payment Requests • Insurance Claims • Complaints • Fraud Data 	<ul style="list-style-type: none"> • Passport • Driving Licence • Utility Bills • Birth Certificate • Marriage Certificate • Bank Statements 	<ul style="list-style-type: none"> • Financial Status • Financial History • Credit Score • Residential Status • Bank Details • Employment Details • Income & Expenditure • Tax Information

Social	Recordings	Special
<ul style="list-style-type: none"> • Family • Dependents 	<ul style="list-style-type: none"> • Call Recordings • CCTV 	<ul style="list-style-type: none"> • Political Opinions • Health • Criminal Convictions

5.7 We use personal and contact information for all customers and others. For other types of information, it will depend on which company in our Group you are a customer of or have provided your data to.

Further information about the personal information Cumberland Building Society collects from you

Customers

	Savings & Current Accounts	Mortgages	Insurance	Business Finance
Personal	✓	✓	✓	✓
Contact	✓	✓	✓	✓
Product	✓	✓	✓	✓
Transactional	✓	✓	✓	✓
Documentary	✓	✓	✓	✓
Financial	✓	✓	✓	✓
Recordings	✓	✓	✓	✓
Social		✓		
Special	✓	✓	✓	✓

Others

	Applicant	Guarantor	Referee	Occupier	Family, Friends or Dependents
Personal	✓	✓	✓	✓	✓
Contact	✓	✓	✓	✓	✓
Product	✓				
Transactional					
Documentary	✓	✓			
Financial	✓	✓			
Recordings	✓	✓			
Social	✓			✓	✓
Special	✓	✓			

Further information about the information Cumberland Sales & Lettings collects from you

Customers

	Sales	Lettings	Valuations
Personal	✓	✓	✓
Contact	✓	✓	✓
Product	✓	✓	✓
Transactional		✓	
Documentary	✓	✓	
Financial	✓	✓	
Recordings	✓	✓	✓
Social		✓	
Special	✓	✓	

Others

	Mail List	Applicant	Tenant	Guarantor
Personal	✓	✓	✓	✓
Contact	✓	✓	✓	✓
Product	✓	✓	✓	✓
Transactional			✓	
Documentary		✓	✓	✓
Financial	✓	✓	✓	✓
Recordings	✓	✓	✓	✓
Social		✓	✓	
Special		✓	✓	

Further information about the information Borderway Finance collects from you

Customers

	Vehicle Finance
Personal	✓
Contact	✓
Product	✓
Transactional	✓
Documentary	✓
Financial	✓
Recordings	✓
Social	
Special	

Others

	Applicant	Indemnifier
Personal	✓	✓
Contact	✓	✓
Product	✓	✓
Transactional		
Documentary	✓	✓
Financial	✓	✓
Recordings	✓	✓
Social		
Special		

Further information about the information Cumberland Financial Services collects from you

Customers

	Financial Advice
Personal	✓
Contact	✓
Product	✓
Transactional	✓
Documentary	✓
Financial	✓
Recordings	✓
Social	✓
Special	✓

Others

	Family or Dependents
Personal	✓
Contact	
Product	
Transactional	
Documentary	
Financial	
Recordings	
Social	✓
Special	

6. Personal information we collect about you from others

- 6.1 We may obtain personal information about you from other organisations such as:
- credit reference, fraud prevention and tenant reference agencies;
 - any referees you have provided to us;
 - people acting on your behalf, such as solicitors and accountants; and
 - other people who know you including joint account holders and people you are linked to financially.

7. How we use your personal information and our basis for doing so

- 7.1 We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:
- a. we have your consent (if consent is needed);
 - b. we need to use the information to comply with our legal obligations;
 - c. we need to use the information to perform a contract with you; and/or
 - d. it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – this can include where it is in our interests to contact you about products or services, market to you, or collaborate with others to improve our services.
- 7.2 Where we use your personal information based on your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.
- 7.3 Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:
- a. we have a legal obligation to do so (for example to protect vulnerable people);
 - b. it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
 - c. it is in the substantial public interest;
 - d. it is necessary for the prevention or detection of crime;
 - e. it is necessary for insurance purposes; or
 - f. you have specifically given us explicit consent to use the information.

Further information about how we use your personal information and our basis for doing so

Reason	Personal Information	Legal Basis	Legitimate Interest
To provide products and services	Personal Contact Product Transactional Financial Social Special	Contract	
To operate your accounts	Personal Contact Product Transactional Documentary Financial Social Special	Contract	
To check identity	Personal Contact Documentary	Legal Obligation	
To carry out credit checks	Personal Contact Financial	Legal Obligation	
To compile internal reports	Personal Product Transactional Financial	Legitimate Interest	To manage our business in an efficient way.
To provide regulatory reports	Personal Product Transactional	Legal Obligation	
To monitor for fraud	Personal Product Transactional Financial Special	Legal Obligation	
To carry out audits	Personal Product Transactional Documentary Financial Special	Legal Obligation	
To defend legal claims and disputes	Personal Contact Product Transactional Financial Recordings Special	Legitimate Interest	To protect our business in the interests of members. To collect money which is owed to us.
To test our systems	Personal Contact Transactional	Legitimate Interest	To ensure our systems are accurate and secure.

To protect our staff	Recordings	Legal Obligation	
To assist law enforcement	Recordings	Legal Obligation	
To provide direct marketing	Personal Contact Product Transactional Financial Social	Legitimate Interest Consent	To develop our business in the interests of members. To sell our products and services.
To tailor information and products to you	Personal Contact Product Transactional Financial Social	Consent	

8. Automated decision making

Sometimes we use your personal information in automated processes to make decisions about you, such as credit scoring. We might also use automated processes to create a profile of you. We do this to help ensure decisions are made accurately, fairly and efficiently and to offer you products and services tailored to you.

Further information on when we use automated processes and the logic, significance and consequences of these processes for you.

Credit scoring

We use automated decision making using your personal information to create a profile of you for credit scoring – a method which predicts your credit worthiness based on your financial profile.

To carry out credit scoring we use information you give to us, information we obtain from credit reference agencies, and details about how you have used other products and services you have with us or the Group (for example how you are making repayments on other credit products). In some cases we will also use external data sources for credit scoring. See below for a list of credit reference agencies we use. We analyse this information to identify a credit score based on how likely it is that debts will be re-paid.

We use credit scoring to make the following decisions about you:

- whether we enter into a contract to provide a product or service to you;
- whether to adjust products or services you have (such as an increasing or decreasing credit limits);
- to pre-approve future products or services for you;
- to authorise overdraft limits; to authorise payments from you; and
- in some cases where we need to recover a debt from you.

Profiling for marketing

We want to ensure that you get the most relevant information about our products and services at the right time. The most effective way for us to do this is to use automated processes to create a profile of you for marketing.

We use processes to analyse your personal information to decide what products and services to offer to you and to prioritise the marketing messages you receive by:

- assessing your eligibility for those products and services;
- assessing how likely they are to be useful for you; and
- deciding how likely you are to respond.

9. Sharing your personal information with others

9.1 In order to process your application and to provide our products and services to you, we will share your personal information with credit reference agencies both at the time of your application and for as long as you are a customer. They also will give us information about you.

Further information about credit reference agencies.

The data we exchange with credit reference agencies can include the following categories:

- Personal
- Contact
- Product
- Financial

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);
- trace and recover debts; and
- ensure any offers provided to you are appropriate to your circumstances.

We will also inform the credit reference agencies about your settled accounts. If you borrow and do not repay in full and on time, credit reference agencies will record the outstanding debt. This information may be supplied to other organisations by credit reference agencies.

When credit reference agencies 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. Credit reference agencies 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 credit reference agencies to break that link.

The identities of the credit reference agencies, 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 credit reference agencies are explained in more detail by each of the three credit reference agencies at the links below:

- www.callcredit.co.uk/crain
- www.equifax.co.uk/crain;
- www.experian.co.uk/crain

9.2 We will also share personal information within our Group and with others outside where we need to do that to make products and services available to you, market products and services to you, meet or enforce a legal obligation or where it is fair and reasonable for us to do so.

9.3 Who we share your personal information with depends on the products and services we provide to you and the purposes we use your personal information for. For most products and services we will share your personal information with our own service providers such as our IT Suppliers.

Further information about others (outside our Group) we share your personal information with.

All Group Companies

Type of Recipient	Industry	Location
Professional Consulting Provider	Financial Services	UK, US
Credit Reference Agencies	Financial Services	UK
Digital Security Provider	IT	UK
Document Storage & Archive Management Provider	Storage & Archiving	UK
Confidential Waste disposal	Data destruction & Recycling	UK

Cumberland Building Society

Type of Recipient	Industry	Location
Financial Regulators	Regulator	UK
Financial Ombudsman	Regulatory	UK
Payment Service Providers	Financial Services	UK, US
Banking Services Providers	Financial Services	UK, USA
Digital Printing Provider	Financial Services	UK
Digital Security Provider	Financial Services	UK, Netherlands, USA
MIG Providers	Financial Services	UK
SMS Fulfilment Platform	IT	UK
Software Providers	IT	UK, Australia, France, New Zealand
Data Analytics Provider	IT	UK
Digital Security Provider	IT	UK
IT Service Provider	IT	UK
Financial Data Analyst	Data	UK
Mailing Houses	Print & Logistics	UK
Valuers	Property	UK
Conveyancing Partner	Legal	UK
Lawyers & Estate Agents	Legal	UK
Insurance Partners	Financial Services	UK

Cumberland Sales & Lettings

Type of Recipient	Industry	Location
Software Providers	IT	UK
Marketing Platform	IT	UK
Call Enhancing Platform	IT	UK
Mobile Technology Provider	IT	UK
Appointment Booking System	IT	UK
Electronic Signature Platform	IT	UK
Auction House	Property	UK
Tenant Credit & Profiling Provider	Property	UK
Conveyancing Partner	Legal	UK
Trade Contractors	Construction	UK
Utilities Management Partner	Utilities	UK
Deposit Trustee	Financial Services	UK
Payment Services Provider	Financial Services	UK

Borderway Finance

Type of Recipient	Industry	Location
Loans Management Platform	IT	UK
Online Application Platform	IT	UK
Accounting Software Provider	IT	UK
SMS Fulfilment Platform	Mobile Technology	UK
Payment Services Provider	Financial Services	UK

Cumberland Financial Services

Type of Recipient	Industry	Location
Regulated Principle	Financial Services	UK
Financial Product Providers	Financial Services	UK

10. Transfers outside the UK

- 10.1 We may need to transfer your information outside the UK to service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area, such as the USA.
- 10.2 We will only transfer your personal information outside the EEA where either the transfer is to a country which the EU Commission has decided ensures an adequate level of protection for your personal information, or we have put in place our own measures to ensure adequate security as required by data protection law. These measures include ensuring that your personal information is kept safe by carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses. We also use the EU Commission approved EU-US Privacy Shield when personal information is transferred to the US. Visit www.privacyshield.gov for more information. You can find out more information about standard contractual clauses as detailed by the ICO. Visit their website at <https://ico.org.uk> and search for 'International transfers'.

11. How long we keep your personal information for

- 11.1 How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.
- 11.2 We keep your personal information we use for up to seven years after closure of your account or from the date you last used one of our services. In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, and for the purpose of making remediation payments.

Further information about how long we keep your personal information for.

You can obtain more specific information about how long we retain particular documents and personal information by contacting our DPO using the details above.

12. Your online activities

- 12.1 Our websites use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our websites and also allows us to improve them. By continuing to browse our websites, you are agreeing to our use of cookies. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your device. For further information visit www.allaboutcookies.org.

Further information about the types of cookies we use.

- 12.2 **Essential cookies:** These cookies are essential in order to enable you to browse our websites and use their features.
- 12.3 **Performance cookies:** These cookies collect information about how visitors use a website, for instance which pages people visit most often. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.
- 12.4 **Functionality cookies:** These cookies allow our websites to remember choices you make (such as your user name) and provide enhanced, more personal features.
- 12.5 **Targeting cookies:** These cookies are used to deliver adverts more relevant to you. The adverts are placed by an advertising network on other websites with our permission by remembering that you have visited our websites.

The following cookies may be stored on your computer:

Cookie	Name	Purpose
Essential: Website cookie (for online enquiry forms)	ICFUSERSESSION	This cookie is essential for the online enquiry forms to operate fully and is set upon your arrival to any Cumberland website (excluding Cumberland Internet Banking). This cookie is deleted when you close your browser.
Essential: Website cookie (for user authentication)	ICFUSERAUTH	This cookie is essential for use of Cumberland websites and is set upon your arrival (excluding Cumberland Internet Banking). This cookie is deleted when you close your browser.
Essential: Website cookie (for cookie notice)	ICFEUDIRECTIVE	This cookie is essential for use of Cumberland websites and is set upon your arrival (excluding Cumberland Internet Banking) to remember that you have been presented with our cookie notice. This cookie will expire after 1 year.
Essential: Website cookie (for optimum content display)	ICFPREFERENCE	This cookie is essential for use of Cumberland websites and is set upon your arrival (excluding Cumberland Internet Banking) to remember which parts of the website you have previously visited to ensure the content is as relevant to you as possible. This cookie will expire after 30 days.
Essential: Mortgage Calculator cookie	cbs_session	This cookie is essential for use of Cumberland Mortgage Calculator and is set upon your arrival onto the Calculator. This cookie is deleted shortly after you close your browser.
Essential: Mortgage Calculator cookie (for security protection)	XSRF-TOKEN	This cookie is essential to help protect the Mortgage Calculator from attacks and is set upon your arrival onto the Calculator. This cookie is deleted shortly after you close your browser.
Performance: Google Analytics	_utma _utmb _utmc _utmz	<p>These cookies are used to collect information about how visitors use our websites (excluding Cumberland Internet Banking). We use the information to compile reports, help us make sure that our websites are available to use at all times, optimise visitors' experience of the websites and help us improve the websites. The cookies collect information in an anonymous form, including the number of visitors to the websites, where visitors have come to the websites from and the pages they visited. You can find an overview of privacy at Google by following this link: www.google.co.uk/intl/en/analytics/privacyoverview.</p> <p>For more information about Google Analytics visit www.google.com/analytics, and to opt out of being tracked by Google Analytics across all websites visit tools.google.com/dlpage/gaoptout.</p>
Essential: Internet & Mobile Banking websites	BL	This cookie allows users of Cumberland Internet and Mobile Banking to use the 'Remember Me' function during the logging on process. This cookie expires on 1 January 2020.
Essential: Internet & Mobile Banking websites	blxxxx	This cookie allows users of Cumberland Internet and Mobile Banking to log on securely. This cookie is deleted when you close your browser.

<p>Targeting: Google Adwords</p>		<p>Our websites use the Google AdWords remarketing service to advertise our products and services on other websites (including Google) to previous visitors to our sites. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Any data collected will be used in accordance with our own privacy policy and Google's privacy policy. No personally identifiable data is collected or stored. This is a third party cookie.</p> <p>You can control the ads that you see on Google and find out more about how the ads are selected for you by visiting www.google.com/settings/ads.</p> <p>Alternatively, you can also manage and opt-out of Google Adwords and other third party cookies by visiting www.youronlinechoices.com/uk/your-ad-choices.</p>
<p>Targeting: Social Media</p>		<p>We use Facebook, Twitter, LinkedIn and Instagram remarketing services to advertise our content, products and services on these social media channels to previous visitors to our site. Any data collected will be used in accordance with our own privacy policy and the social network's privacy policy. Detail around how you may opt out of receiving these cookies are found in the links below:</p> <p>Cookie policy: www.facebook.com/policies/cookies/ support.twitter.com/articles/20170514 www.linkedin.com/legal/cookie-policy www.instagram.com/legal/cookies/</p> <p>Privacy policy: www.facebook.com/full_data_use_policy twitter.com/privacy www.linkedin.com/legal/privacy-policy help.instagram.com/155833707900388</p>