

USE OF PERSONAL DATA

In this notice “we” means Secure Trust Bank PLC or anyone acting on our behalf. When we use “you”, we mean the shareholder, director, partner or owner.

Please read this notice to understand how and why we will process your personal information in connection with the application for funding. This notice is given in addition to our Privacy Statement, which covers our processing of personal information more widely than only this application, and contains more details about how we will process your personal information.

Our Privacy Statement is published at <https://www.securetrustbank.com/privacy-statement-2> and you are encouraged to read this in full.

What information we collect

We process personal information that:

- you give us on the declaration form; and
- we receive from third parties such as credit reference agencies and fraud prevention agencies.

What personal information we process

This personal information includes your:

- name;
- date of birth;
- address;
- bank account details for sole traders;
- credit history, and records relating to your partner or anyone else you are financially linked with (we receive this information from the credit reference agencies and fraud prevention agencies); and
- information you make public (for example on social media and on public registers).

How we use your personal information

In summary, we use your personal information for the purposes of:

- servicing and internal processing;
- management of our relationship with you (e.g. to develop your relationship with us);
- resolving queries/problems (e.g. responding to complaints);
- training and service review (e.g. to help us enhance our services); and
- complying with legal obligations (e.g. to prevent, investigate and prosecute crime, fraud and money laundering).

We process your personal information to fulfil our contract with you, where we have a legitimate interest to do so (except where it would override your interests or fundamental rights and freedoms which require the protection of personal information), where otherwise permitted by law, or to comply with applicable law and regulation.

We use your personal information for the purposes of complying with legal obligations to manage and control risk and for the prevention of financial crime and money laundering.

How we retain your information

The personal information that you provide will be retained by us in accordance with applicable laws. We take reasonable steps to destroy or anonymise personal information we hold if it is no longer needed for the purposes set out above. Our retention period for your personal information is 7 years after account closure/end of relationship, or for incomplete or declined applications 1 year from the last activity on the application.

How we share your information

The recipients with whom we share personal information are:

- outsourced service providers who act on our instruction and need to know the information in order to provide us or you with a product or service;
- our partners including brokers we work with;
- our advisors, for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations, including solicitors, valuers and other advisors;
- anyone who provides security to us for your obligations;
- our regulators (including the Prudential Regulation Authority, Financial Conduct Authority and Information Commissioner’s Office) to comply with our legal and regulatory obligations;
- credit reference agencies and fraud prevention agencies – see section below for more details.

Sharing with credit reference agencies and fraud prevention agencies

In order to process the application of the entity of which you are shareholder, director, partner or owner, we will undertake checks on you for the purposes of detecting and preventing crime, fraud and money laundering, and to verify your identity. These checks require us to process your personal information with the credit reference agencies and fraud prevention agencies.

We continue to conduct regular or extraordinary checks for the same purposes while you have a relationship with us, for example an annual check with credit reference agencies and fraud prevention agencies or searches when there is a change in company structure.

Credit reference agencies will supply us with information about you. This will include both public information (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information. They will add information about our search to the record about you.

If we determine that you pose a fraud or money laundering risk, we may refuse to provide you with a facility, or we may require repayment of the facility or we may stop providing existing services to you. If you have an agreement with us and we wish to require the repayment of facility then the terms of that agreement will dictate how we do this.

Credit reference agencies hold your personal information for up to six years. These records will be shared with other organisations and may be used and searched by us and them to:

- consider applications for credit and credit related services, such as insurance, for you and any associated person; and
- trace debtors, recover debts, prevent or detect money laundering and fraud, and to manage accounts.

If you are considered to pose a fraud or money laundering risk, your information is held for up to six years. 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 or financing to you. If you have any questions about this, please contact the fraud prevention agencies on the details below.

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

We use Equifax as our credit reference agency. More information about the Equifax and how they process your personal information is available at: www.equifax.co.uk/crain. The fraud prevention databases we use are provided by Synectics and Lexis Nexis. Further information can be found at www.synectics-solutions.com and www.lexisnexis.co.uk/en-uk/

We respect your rights

You have the right to request copies of certain of your personal information within our custody and control and details of how we use that information. Your request should be made in writing.

If you think any of the personal information we hold about you is inaccurate, you may also request it is corrected or erased.

You also have rights, in certain circumstances:

- to object to our processing of your personal information;
- to require us to stop processing your personal information.

Data Protection Officer

If you are unhappy about how your personal information has been used please contact our data protection officer using the details set out below. You also have a right to complain to the Information Commissioner's Office (<https://www.ico.org.uk>), which regulates the processing of personal data. Our data protection officer can be contacted by telephone or in writing:

Data Protection Officer
Secure Trust Bank
One Arlestone Way
Solihull, B90 4LH
Telephone queries can be made to: 0121 693 9100.