

PIBS HOLDERS PRIVACY NOTICE

YOUR PERSONAL INFORMATION
AND WHAT WE DO WITH IT

THE MEANING OF SOME TERMS THAT WE USE IN THIS PRIVACY NOTICE

Automated decision making means a process where we make decisions about you, such as your suitability for a product, using a computer based and automated system without a person being involved in making that decision (at least first time around).

Profiling means any form of automated processing of your personal information to evaluate certain personal aspects about you, such as to analyse or predict aspects concerning your economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Process or **processing** includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. This includes for instance collecting it (from you), obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.

Legitimate interests is mentioned in our privacy notice because data protection laws allow the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interests legal ground for personal data processing.

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WHO WE ARE AND HOW TO CONTACT US

Manchester Building Society of 125 Portland Street, Manchester M1 4QD is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information.

We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as **we**, **us** and **our** in this notice, we mean Manchester Building Society.

We have appointed a Registrar, Equiniti Ltd of Aspect House, Spencer Road, Lancing, West Sussex BN99 6DA, to service the Register of Shareholders on our behalf. They act as a data processor of your personal information.

Our Data Protection Officer can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it. The contact details are:

Post: Data Protection Officer
Manchester Building Society
125 Portland Street
Manchester
M1 4QD

Telephone: 0161 923 8000

This privacy notice may be updated from time to time. This means we may send you an updated copy (depending on whether we are required to do that or not). An up to date version will be made available via our website, www.themanchester.co.uk.

WHAT KINDS OF PERSONAL INFORMATION ABOUT YOU DO WE PROCESS?

For shareholders of our Permanent Interest Bearing Shares (PIBS), the personal information we process includes:

- Your title and full name;
- Your contact details, including for instance your email address, home and mobile telephone numbers;
- Your address;
- Your date of birth;
- Records of how you have contacted us and, if you get in touch with us online, details such as your IP address and MAC address;
- Your financial details e.g. details of bank account(s); and
- The number of PIBS held.

JOINT SHAREHOLDERS

If you purchase PIBS in joint names, we will also collect personal information about the joint shareholder(s).

You must show this privacy notice to any other parties involved and ensure they confirm that they know you will share their information with us for the purposes described in it.

WHAT IS THE SOURCE OF YOUR PERSONAL INFORMATION?

We will generally collect your personal information from you directly or via the professional advisor, such as a stockbroker, you instruct to purchase the PIBS.

WHAT ARE THE LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL INFORMATION (INCLUDING WHEN WE SHARE IT WITH OTHERS)?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant.

Here are the legal grounds that are relevant to us:

- 1) Processing necessary **to perform our contract with you for the shareholding:**
 - a) Administering and managing your shareholding and services relating to that, updating your records, tracing your whereabouts to contact you;
 - b) Sharing your personal information with other payment services providers such as for the payment of interest;
 - c) All stages and activities relevant to managing your shareholding.
- 2) Where we consider that, on balance, it is appropriate for us to do so, processing necessary **for the following legitimate interests** which apply to us and in some cases other organisations (who we list below) are:
 - a) Administering and managing shareholding and services relating to that, updating your records, tracing your whereabouts to contact you;
 - b) 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 Ombudsman, and the Information Commissioner's Office;
 - c) For management and audit of our business operations including accounting;
 - d) To carry out monitoring and to keep records (see our section on monitoring);
 - e) To administer our good governance requirements and those of other members of our Group, such as internal reporting and compliance obligations or administration required for AGM processes;
 - f) For market research and analysis and developing statistics; and
 - g) When we share your personal information with these other people or organisations:
 - Members of our Group;
 - Other payment services providers such as for the payment of interest;
 - Our legal and other professional advisers, auditors and actuaries;
 - Financial institutions and trade associations;
 - Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman, and the Information Commissioner's Office;
 - Other organisations and businesses who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions; and
 - Buyers and their professional representatives as part of any restructuring or sale of our business or assets.

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Processing necessary to comply with our legal obligations:

- a) For compliance with laws that apply to us;
- b) For establishment, defence and enforcement of our legal rights or those of any other member of our Group;
- c) For activities relating to the prevention, detection and investigation of crime;
- d) To carry out identity checks and anti-money laundering checks;
- e) To carry out monitoring and to keep records (see our section on monitoring);
- f) To deal with requests from you to exercise your rights under data protection laws;
- g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
- h) When we share your personal information with these other people or organisations:
 - Other payment services providers such as for the payment of interest;
 - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Ombudsman and the Information Commissioner's Office; and
 - Courts and other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

IS YOUR PERSONAL INFORMATION TRANSFERRED OUTSIDE THE UK OR THE EEA?

We are based in the UK but sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us.

Safeguards include contractual obligations imposed on the recipients of your personal information. Those obligations require the recipient to protect your personal information to the standard required in the European Economic Area. Safeguards also include requiring the recipient to subscribe to 'international frameworks' intended to enable secure data sharing and where the framework is the means of protection for the personal information.

Your personal information may be transferred to India where the Registrar, Equiniti Ltd, carries out some of its processing.

WHAT SHOULD YOU DO IF YOUR PERSONAL INFORMATION CHANGES?

You should inform the Registrar without delay so that your records can be updated.

The contact details for this purpose in relation to your shareholding are:

Post: Equiniti Ltd
Aspect House
Spencer Road
Lancing
West Sussex
BN99 6DA

DO YOU HAVE TO PROVIDE YOUR PERSONAL INFORMATION TO US?

We are unable to provide you with and maintain your shareholding without having personal information about you. Your personal information is required before you can enter into the relevant contract with us, during the life of that contract, and by laws that apply to us.

DO WE DO ANY MONITORING INVOLVING PROCESSING OF YOUR PERSONAL INFORMATION?

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, in person face to face meetings and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in person meetings (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to protect you and to provide security for you (such as in relation to fraud risks on your account) and for quality control and staff training purposes.

Some of our monitoring may check for obscene or profane content in communications.

FOR HOW LONG IS YOUR PERSONAL INFORMATION RETAINED BY US?

Unless we explain otherwise to you, we will hold your personal information for the following period:

- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 7 years and this will be to satisfy our legal and regulatory requirements.

If you would like further information about our data retention practices, contact our Data Protection Officer.

WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LAWS?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. The right of data portability is only relevant from May 2018.

The **right to be informed** – we have to be transparent with you about the processing that we do with your personal information. This is why we have a privacy notice. Your right to be informed may be relevant if you consider it necessary to ask for more information about what we do with your personal information.

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The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed** in certain circumstances. If we have disclosed the personal information in question to other organisations, we must inform them of the rectification where possible. Your rights in relation to rectification may be relevant if you consider that we are processing inaccurate or incomplete information about you.

The right to **object** to processing of your personal information where it is based on legitimate interests, where it is processed for direct marketing (including profiling relevant to direct marketing) or where it is processed for the purposes of statistics. There is an important difference between the right to object to profiling relevant to direct marketing in cases where that profiling activity does not have a legal effect on you or otherwise significantly affect you, and the separate right which exists under data protection laws in relation to profiling including automated decision making which has a legal effect or can otherwise significantly affect you (see later in this section).

The right to **restrict processing** of your personal information, for instance where you contest it as being inaccurate (until the accuracy is verified); where you have objected to the processing (where it was necessary for legitimate interests) and we are considering whether our organisation's legitimate interests override your own; where you consider that the processing is unlawful (and where this the case) and where you oppose erasure and request restriction instead; or where we no longer need the personal information for the purposes of the processing for which we were holding it but where you require us to continue to hold it for the establishment, exercise or defence of legal claims.

The right to **have your personal information erased** (also known as the "right to be forgotten"). This enables an individual to request the deletion or removal of personal information where there is no compelling reason for its continued processing. This right is not absolute – it applies only in particular circumstances and where it does not apply any request for erasure will be rejected. It may be relevant where the personal information is no longer necessary in relation to the purpose for which it was originally collected/processed; if the processing is based on consent which you then withdraw; when you object to the processing and there is no overriding legitimate interest for continuing it; if the personal information is unlawfully processed; or if the personal information has to be erased to comply with a legal obligation. Requests for erasure may be refused in some circumstances such as where the personal information has to be retained to comply with a legal obligation or to exercise or defend legal claims.

The right to **request access** to the personal information held about you, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how we process it. This may assist if you wish to find out what personal information we do have about you in order to then determine if you can exercise the other rights mentioned in this section.

The right to **data portability**. This allows individuals to obtain and reuse their personal information for their own purposes across different services; to move, copy or transfer their personal information easily from one environment to another in a safe and secure way without hindrance to usability. This right can only be relevant where personal information is being processed based on a consent or for performance of a contract and is carried out by automated means. This right is different from the right of access (see earlier in this section) and the types of information you can obtain under the two separate rights may be different. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access.

Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**. This right allows individuals in certain circumstances to access certain safeguards against the risk that a potentially damaging decision is taken solely without human intervention. This right is different from the more general right to object to profiling (see earlier in this section) because that other right is not tied to a scenario where there is a legal effect on you or where the processing otherwise significantly affects you. Data protection laws prohibit this particular type of automated decision making except where it is necessary for entering into or performing a contract; is authorised by law; or where you have explicitly consented to it. In those cases, you have the right to obtain human intervention and an explanation of the decision and you may be able to challenge that decision.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>

DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

WHO IS IN OUR GROUP

As at the date of this privacy notice, the members of our Group are: Manchester Building Society, MBS (Mortgages) Limited and MBS (Property) Limited.



Manchester Building Society, 125 Portland Street, Manchester M1 4QD
Tel: 0161 923 8000 Fax: 0161 923 8950 Email: info@themanchester.co.uk

Manchester Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our Financial Services Register number is 206048. Head office: 125 Portland Street, Manchester M1 4QD.
Member of the Building Societies Association, UK Finance and covered by the Financial Services Compensation Scheme.
Registered in the Mutuals Public Register, Register number 356 B.
Manchester Building Society record and monitor telephone calls for training, quality control and regulatory purposes.

www.themanchester.co.uk