

# Data Protection Statement SCIB

April 2018

# Introduction

My personal data is data which by itself, or with other data available to you, can be used to identify me. You are Santander Corporate & Investment Banking which is a brand name of Santander UK (which also uses the brand name Santander Corporate & Commercial Banking), the data controllers. This data protection statement sets out how you will use my personal data. I can contact your Data Protection Officer (DPO) at 201 Grafton Gate East, Milton Keynes, MK9 1AN if I have any questions.

This statement relates to the use of personal data obtained on the directors, shareholders, beneficial owners or any named official who will see the transactions on the service I have applied for. It covers the processing of personal data whether or not I become a customer and includes any processing of personal data before I apply for a service. Any references to 'you' or 'your' are references to Santander Corporate & Investment Banking.

Where there are two or more people named, I understand this data protection statement applies to each person separately.

## The types of personal data you collect and use

Whether or not I become a customer, you will use my personal data for the reasons set out below and if I become a customer you will use it to manage the service I have applied for. You will collect most of this **directly** during the application process. The sources of personal data collected **indirectly** are covered in this statement. The personal data you use about me may include:

- Full name and personal details, including contact information (e.g. home and business address and address history, email address, home, business and mobile phone numbers);
- Date of birth and/or age (e.g. to make sure that I am eligible to apply);
- Financial details (e.g. salary and details of other income, and details of services held with other providers);
- Records of services I have obtained or applied for;
- Information from credit reference or fraud prevention agencies, electoral roll, court records of debt judgements and bankruptcies and other publicly available sources, as well as information on any financial associates I may have;
- Family, lifestyle or social circumstances if relevant to the service;
- Education and employment details/employment status for credit and fraud prevention purposes;
- Personal data about other named applicants. I must have their authority to provide their personal data to you and share this data protection statement with them beforehand together with details of what I've agreed on their behalf; and
- Contact details and information about my business if I am a prospective customer.

## Providing my personal data

You will tell me if providing some personal data is optional, including if you ask for my consent to process it. In all other cases I must provide my personal data so you can process my application.

## Monitoring of communications

Subject to applicable laws, you will monitor and record my calls, emails, text messages, social media messages and other communications relating to my dealings with you. You will do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of your communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when you need to see a record of what has been said. You may also monitor activities associated with the service you provide me for these reasons. This is justified by your legitimate interests or your legal obligations.

## Using my personal data: the legal basis and purposes

You will process my personal data:

1. As necessary to **perform your contract with me** for the relevant service:
  - a) To take steps at my request prior to entering into it;
  - b) To decide whether to enter into it;
  - c) To manage and perform that contract; and
  - d) To update your records.
2. As necessary **for your own legitimate interests** or those of other persons and organisations, e.g.:
  - a) For good governance, accounting, managing and auditing your business operations;
  - b) To search at credit reference agencies if I am over 18;
  - c) To monitor emails, calls, other communications, and activities on my service;
  - d) For market research, analysis and developing statistics; and
  - e) To send marketing communications on corporate services.

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3. As necessary to comply with a legal obligation, e.g.:
  - a) When I exercise my rights under data protection law and make requests;
  - b) For compliance with legal and regulatory requirements and related disclosures;
  - c) For establishment and defence of legal rights;
  - d) For activities relating to the prevention, detection and investigation of crime;
  - e) To verify my identity, make credit, fraud prevention and anti-money laundering checks; and
  - f) To monitor emails, calls, other communications, and activities on my service.
4. Based on my consent, e.g.:
  - a) When I request you to disclose my personal data to other people or organisations such as a company handling a claim on my behalf, or otherwise agree to disclosures.

I am free at any time to change my mind and withdraw my consent. The consequence might be that you cannot do certain things for me.

### Sharing of my personal data

Subject to applicable data protection law you may share my personal data with:

- The Santander group of companies and associated companies in which you have shareholdings and employees, officers, agents or professional advisors of these companies;
- Sub-contractors and other persons who help you provide your products and services;
- Companies and other persons providing services to you;
- Your legal and other professional advisors, including your auditors;
- Fraud prevention agencies and credit reference agencies when you open my service and periodically during my service management;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities and with regulators e.g. the Prudential Regulation Authority, the Financial Conduct Authority, the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- Other parties where necessary in an emergency or to otherwise protect my vital interests;
- Other parties where necessary to protect the security or integrity of your business operations;
- Other parties connected with my service e.g. directors, shareholders, beneficial owners or any named official who will see my transactions;
- Other parties when you restructure or sell your business or its assets or have a merger or re-organisation;
- Market research organisations who help to improve your services;
- External sources of publically available information such as Companies House, credit reference agencies; and other internal insight; and
- Anyone else where you have my consent or as required by law.

### International transfers

My personal data may be transferred outside the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection. Further details can be found in the 'Using My Personal Data' booklet.

### Data anonymisation and aggregation

My personal data may be converted into statistical or aggregated data which cannot be used to identify me, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

### Identity verification and fraud prevention checks

The personal data you have collected from me at application or at any stage will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify my identity. If fraud is detected, I could be refused certain services, finance or employment in future. You may also search and use your internal records for these purposes. Further details on how my personal data will be used by you and these fraud prevention agencies, and my data protection rights, can be found in the 'Using My Personal Data' booklet. You may also hold all the information I give to you (i.e. name, address, date of birth, nationality) to conduct periodic due diligence checks which banks are required to undertake to comply with UK legislation.

### Credit reference checks

If I apply for a service you will perform credit and identity checks on me at my home and business address with one or more credit reference agencies. To do this you will supply my personal data to the credit reference agencies and they will give you information about me.

When you carry out a search at the credit reference agencies they will place a footprint on my credit file. This footprint will be viewable by other lenders and may affect my ability to get credit elsewhere. (A credit search is not carried out if I am under 18). You will also continue to exchange information about me with credit reference agencies while I have a relationship with you. The credit reference agencies may in turn share my personal information with other organisations.

The personal data shared with the credit reference agencies will relate to me. Details about my application (whether or not it is successful) will be recorded.

Records of searches with credit reference agencies will be retained by them based on their legal and regulatory requirements. A financial association link between myself and any named business partner or individual will be created at the credit reference agencies. This will link our financial records and be taken into account in all future applications by either or both of us until either of us apply for a notice of disassociation with the credit reference agencies.

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If I am a director you will seek confirmation from the credit reference agencies that the residential address that I provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

The identities of the credit reference agencies, and the ways in which they use and share personal information is explained in more detail in the 'Using My Personal Data' booklet, or via the Credit Reference Agency Information Notice (CRAIN) document which can be accessed via any of the following links:

- [experian.co.uk/crain](https://experian.co.uk/crain)
- [equifax.co.uk/crain](https://equifax.co.uk/crain)
- [callcredit.co.uk/crain](https://callcredit.co.uk/crain)

### Automated decision making and processing

Automated decision making involves processing my personal data without human intervention to evaluate my personal situation such as my economic position, personal preferences, interests or behaviour.

Santander Corporate & Investment Banking do not undertake automated decision making or processing.

### My marketing preferences

You will use my business address, business phone numbers, and business email address to contact me regarding corporate services you offer.

If I wish to opt out of receiving marketing on corporate services I can do so at any time.

### Criteria used to determine retention periods (whether or not I become a customer)

The following criteria are used to determine data retention periods for my personal data:

- **Retention in case of queries.** You will retain my personal data as long as necessary to deal with my queries (e.g. if my application is unsuccessful);
- **Retention in case of claims.** You will retain my personal data for as long as I might legally bring claims against you; and
- **Retention in accordance with legal and regulatory requirements.** You will retain my personal data after my service has been closed or has otherwise come to an end based on your legal and regulatory requirements.

### My rights under applicable data protection law

My rights are as follows (noting that these rights don't apply in all circumstances):

- The **right to be informed** about your processing of my personal data;
- The right to have my personal data **corrected if it is inaccurate** and to have **incomplete personal data completed**;
- The right to **object** to processing of my personal data;
- The right to **restrict processing** of my personal data;
- The right to have my personal data **erased** (the "right to be forgotten");
- The right to **request access** to my personal data and information about how you process it;
- The right to **move, copy or transfer my personal data** ("data portability"); and
- Rights in relation to **automated decision making** including profiling.

I have the right to complain to the Information Commissioner's Office, which has enforcement powers and can investigate compliance with data protection law: [ico.org.uk](https://ico.org.uk).

For more details on all the above I can contact your DPO or access the 'Using My Personal Data' booklet online at [santandercib.co.uk](https://santandercib.co.uk).

### Group companies

For more information on the Santander group companies, please see the 'Using My Personal Data' booklet.