

How we use your personal and business information

Correct as at 1 April 2020

Danske Bank

Data Protection Privacy Notice

This notice explains how we use your personal information, sets out your rights under the new laws and explains how the law protects you. We may update our Privacy Notice from time to time and publish the updated version on our website.

If we provide you with an account or other banking services then we will use your personal and, if you are a business customer, your business information, in the ways set out in this notice. If you are not content that we will use your information in these ways we may not be able to provide you with an account or other banking services.

Who we are

Danske Bank is a trading name of Northern Bank Limited which is a member of the Danske Bank Group (the Group). This privacy notice is to let you know how companies within the Group will look after your personal information. This includes what you tell us about yourself, what we learn by having you as a customer, and the choices you give us about what marketing you want us to send you. Danske Bank wants to be recognised as a trusted financial partner and is committed to protecting and respecting your privacy. We will treat your information as confidential at all times, even when you are no longer a customer.

Under Data Protection Laws we can only process your personal information where we have a proper reason for doing so, such as:

- it is in our own legitimate interests to do so
- we are required to do so by law i.e. a legal obligation
- you have entered or you are considering entering into a contract with us for a financial product or service
- you have granted us consent to process your personal information

A legitimate interest is when we have a business or commercial reason to use your information for example to prevent abuse and loss, to strengthen IT and payment security or for marketing purposes. We must, however,

still treat you fairly and consider what is right for you. We only rely on legitimate interest as a reason for processing if our legitimate interest clearly outweighs your interest in not having your personal data processed by us.

What personal data do we collect

Depending on the services you have ordered or you are interested in, we collect and process different kinds of personal data, including:

- your core personal data, e.g. your name and contact information
- your financial information, e.g. your credit rating or history or information about debts owed to you
- data about your education, profession or work
- information about your family and other relationships
- details about the services and products we provide to you and your preferences towards them

Where do we collect your information from

We hold personal and financial information about you which you have provided to us or which we have collected/received from elsewhere such as:

- information you provide to us for example: on application forms, emails, letters, secure messages, information you provide over the telephone or in person;
- information we get from how you use your accounts;
- details of who supplies goods and services to you;
- information from other organisations, such as credit reference and fraud prevention agencies;
- information from people who know you, such as joint account holders and people you are financially linked to; and
- information that other people (such as your advisors) give us during financial reviews and interviews, as well as information we get from analysing your banking transactions.
- via digital channels and social media platforms such as Facebook and LinkedIn

Sometimes we need your consent to use your personal information. For example, for direct marketing, we need

your consent to make you aware of products and services which may be of interest to you. There may also be times when the information we hold about you could include sensitive personal data, such as information relating to your health, racial or ethnic background, sexual life, criminal convictions, biometric data or legal proceedings. When we process such data we will either have asked for your consent, or we are permitted to do so by law, for example, for the purposes of detecting and preventing financial crime or to protect your economic wellbeing. Before you give your consent, we tell you what information we collect and what we use it for.

If processing is based entirely on consent, you can withdraw it at any time by contacting us using the contact details at the end of this notice.

Please note that if you withdraw your consent, we might not be able to provide you with specific services or products.

We want our service to meet your expectations at all times and therefore we need the information we hold about you to be accurate and up to date. Please help us by telling us straightaway if there are any changes to your personal information. You can check the contact details that we have for you through eBanking or District or by contacting your branch or Account Manager. It is important that you tell us about any changes to your contact details, including your email address or mobile number.

Why do we collect your information

At Danske Bank we store and use your information to manage your accounts and to provide services that suit your needs. This includes payments, customer advice, customer care, handling of complaints, customer administration, credit assessment and marketing as well as compliance with statutory obligations.

As well as using your information to manage the products and services we provide to you, we will need to use your data for a number of other reasons. These include the following:

- **Verifying your identity**

We will use the personal information that you provide to us to verify your identity, age and residence, in order to prevent and detect financial crime and money laundering. We have a legal obligation under Anti-Money Laundering legislation to seek verification of your identity both when you initially apply for a banking service and also on an ongoing basis. We use a commercial third party that provides electronic verification to do this.

- **Assessing the suitability of products or services**

We will use your information to assess whether our products and services are suitable for you, including making credit decisions about you. This will involve testing our systems, credit scoring and regular statistical analysis to produce management information relating to risk.

If you are financially linked to another account holder within the Group, we will look at your information when deciding whether to approve an application for credit by the person you are linked to, including when that person applies on behalf of a business that he or she owns. (For a full list of companies in the Group, please contact your branch or write to the Data Protection Officer, Danske Bank, Donegall Square West, Belfast. BT1 6JS).

We will link information about your accounts with us to information about other products and services we provide you. We will also link your information to the information relating to other people you are financially linked to, if you make a joint application or if you tell us that you have a husband, wife, civil partner or partner. You should make sure you have shared the relevant information from this notice with them.

- **Preventing fraud or recovering debt**

We will use your information to prevent fraud and recover debts.

For example, when

- checking details for applications and managing credit and credit related accounts or other facilities
- recovering debt

- checking details on proposals and claims for all types of insurance, and
- checking details of job applicants and employees.

We will use credit reference and fraud prevention agencies including industry bodies to help us make decisions when you apply for a loan or for a product which allows you to get credit.

If you provide false or inaccurate information and we find that you have committed fraud, we will pass your details to fraud prevention agencies. 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 fraud prevention agencies, and your data protection rights, can be found at <https://www.cifas.org.uk/fpn>

If you want to receive details of the relevant fraud prevention agencies, please contact your branch or use the contact details at the end of this notice.

We and other organisations also access and use information recorded by the fraud prevention agencies in other countries.

Law enforcement agencies will also access and use this information.

Before we provide you with credit, we will carry out credit searches using credit reference agencies. These checks are necessary before we enter into a contract for credit related products or services with you. During our business relationship with you, we will also share your information with credit reference agencies as part of our legitimate interests to promote responsible lending and prudent account management. To learn more about what credit reference agencies do, what information they hold and what your rights are, go to <http://experian.co.uk/crain/index.html>

We will provide you with further information when you ask us for credit.

- **Protecting you**

We use your information to protect you in the following ways:

- We may record or monitor phone calls to confirm details of our conversations, and for verification and quality purposes.

- We use CCTV to record images in and around our premises to prevent and detect crime.
- We will analyse transactions on customer accounts using behavioural biometrics to prevent and protect fraud and financial crime.

Using your personal information in this way allows us to comply with our legal obligations and meet our legitimate interests.

- **Research purposes**

We will also use your information for research purposes and undertake automated decision making including profiling to understand your buying preferences. We also use data analytics and statistics to improve our products and services.

Using your personal information in this way allows us to develop, improve and market our products and services to meet our legitimate interests.

- **Sharing your information**

There are other circumstances where we need to provide information to other people to help us and you to run your accounts. We do so when it is in your interests as well as ours and/or where we are under a legal or regulatory obligation to do so. We have set out these circumstances below:

- We may provide information about you to someone you nominate or authorise to act on your behalf. If you have a shared account with someone, we might share your information with your co-account holder.
- If we refer you to third parties that provide you with products and services, we must pass your details to these parties. They will keep a record, of information we provide.
- We may exchange information about you with other companies in the Group to assess credit risk, to prevent fraud or manage risk, or to help us run your accounts. We may also share your information within the Group to prepare research and analyse statistics (including analysing risk and credit) so that we can improve our services.
- We will sometimes arrange for service providers, agents and subcontractors, including those from outside the European Economic Area (EEA), to provide services and process your information on our behalf.

We will make sure that these service providers, agents and subcontractors have a duty to keep your information confidential and secure, and that they only process your information as set out in a written contract. Where we use third parties from outside the EEA, we will ensure that your rights under Data Protection Laws are safeguarded through the appropriate protections, including model clauses where appropriate.

- To meet our duties to regulators, we will allow authorised people to see our records (which will include information about you) for reporting, compliance and auditing purposes.
- To meet our legal obligations under the Payment Services Regulations to resolve a dispute or complaint or if we have received a request to return a payment that has been made into your account where the Payer has told his/her bank that the payment was made by mistake, we must, on receipt of a written request, provide to the payer all relevant information in order for the payer to claim repayment of the funds from you. This means that we can provide your name and address to the payer's bank. The payee's bank should inform you before disclosing your name and address to the payee.
- We may also share information with certain statutory, public, industry and law enforcement bodies, e.g. the Financial Services Compensation Scheme (FSCS) if required by law or to protect your vital interests.
- Social media companies such as Facebook if you have given us permission to do so via cookies and similar technology.

How long do we keep your information?

We will keep your personal information for as long as you are a customer of Danske Bank. We will also keep your data for up to 7 years after you stop being a customer for the following reasons:

- To respond to a complaint, or to show whether we treated you fairly;
- To analyse customer data for research purposes;
- To comply with legislative or regulatory requirements.

If you are a potential new customer but do not in future become a customer, your personal data may be stored for up to 12 months depending upon the service or product about which you enquired.

Your Privacy Rights

You have a number of rights under the Data Protection Laws in relation to the way we process your personal data, which are set out below. We will aim to respond to any request received from you in relation to exercising your rights within one month from your request, although this may be extended in some circumstances in line with Data Protection Laws.

- You have the right to access the information that we, as a bank, are processing about you and to be told where the information comes from and what we use it for. You also have the right to be informed about how long we store your information and about those with whom we share your information. Your right of access may, however, be restricted by law, the need to protect another individual's privacy or consideration for the bank's commercial business strategies and operations. You must write to us if you want to see this information at this address. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where we are entitled to do so under Data Protection Laws.
- The right to ask us to correct your information if you think the information that we hold about you is wrong or incomplete.
- The right to object to our use of your information, or to ask us to delete, remove or stop keeping it if there is no need for us to keep it. This is known as the 'right to object', the 'right to erasure' or the 'right to be forgotten'. There may however be legal or regulatory reasons why we need to keep or use your information. We may sometimes be able to restrict the use of your information so that it is only used for legal claims or to exercise legal rights. In these situations we would not use or share your information while it is restricted.
- You have the right not to be subject to automated decision making, where it affects your legal rights or has an adverse impact on you, for example, the refusal of an online credit application.
- You also have the right to ask us to stop using your information for profiling for marketing purposes. If you have given us your consent to process your data and

the processing is automated, you have the right to get your personal information from us in an electronic format that can easily be reused. You can also ask us to pass your information in this format to other organisations.

If you wish to exercise any of these rights, please write to the Data Protection Officer, Danske Bank, Donegall Square West, Belfast, BT1 6JS or contact us at: yourprivacyrights@danskebank.co.uk

Market research

To help us improve and measure the quality of our products and services we undertake market research from time to time. This may involve sharing your information with specialist market research companies. If you do not want to take part please contact us and we will record this.

Profiling and Automated decision making

Profiling and automated decision making. Danske Bank uses automated decision making, including profiling, to approve applications for loans or credit cards, to prevent fraud and, in the case of profiling, to be able to offer you specific services and products that meet your preferences and to target our marketing in general.

Keeping you up to date via emails and text message

We are keen to keep you up to date with changes to the service we provide (for example, if we extend our opening hours at your local branch) or interruptions to our service, or also to remind you to activate and use the online services for which you have registered.

If you have given us your email address or mobile number, we may use these to send you messages. If you do not want us to contact you by text message or email, please contact us and we will delete these details from our records. If you are a personal customer you can delete the details yourself through eBanking (under the heading 'Are your details correct?').

Marketing and Customer Experience

Through our marketing programme, we will identify and tell you about products and services supplied by us or

other chosen organisations that we consider may be of interest to you. We may do this by phone, mail, email, text or through other digital media where you have given us your consent to being marketed by these methods. You can decide on how you wish to receive direct marketing. We will also use the information we have gathered on you to personalise your experience on digital media such as websites, apps, ATMs, social media sites, mobiles and tablet devices. This may include giving you product and service content we believe might be of interest to you. You do not have to accept the products or services we offer. You can tell us in writing at any time if you do not want to receive marketing information.

Cookies

We will collect your data while you are using our websites or mobile apps. If you do, you will still see some marketing but it will not be tailored to you. You can find out about cookies and how we use them to improve our websites and mobile apps in our cookie policy at: <https://danskebank.co.uk/personal>

How to complain

If you are unhappy with how we have handled your personal information, you have the right to complain to the Information Commissioner's Office. You can contact them by writing to the:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Data Protection Officer

We have appointed a Data Protection Officer to advise us about our data protection obligations and to monitor compliance. You can contact the Data Protection Officer by writing to the Data Protection Officer, Danske Bank, Donegall Square West, Belfast, BT1 6JS or by emailing us at yourprivacyrights@danskebank.co.uk

This publication is also available in Braille, in large print, on tape and on disk. Speak to a member of staff for details.

Danske Bank is a trading name of Northern Bank Limited which is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, Financial Services Register, reference number 122261.

Registered in Northern Ireland R568.

Registered Office:
Donegall Square West
Belfast BT1 6JS

Northern Bank Limited is a member of the Danske Bank Group.

danskebank.co.uk