

# A GUIDE TO THE USE OF YOUR PERSONAL DATA

BY WESLEYAN BANK,  
CREDIT REFERENCE AND  
FRAUD PREVENTION AGENCIES

🔒 Important Data Protection 🔒



**WESLEYAN BANK**

*we are all about you*

**Q: What is a credit reference agency?**

**A:** Credit reference agencies (CRAs) collect and maintain information on consumers' and businesses' credit behaviour, on behalf of organisations in the UK.

**Q: What is a fraud prevention agency?**

**A:** Fraud prevention agencies (FPAs) collect, maintain and share information on known and suspected fraudulent activity. Some CRAs also act as FPAs.

**Q: Why do you use them when I have applied to your organisation?**

**A:** Although you have applied to us, Wesleyan Bank Ltd, and we will check our own records, we will also contact CRAs to get information on your credit behaviour with other organisations. This will help us make the best possible assessment of your overall situation before we make a decision.

**Q: Where do they get the information?**

- A:** ▶ Publicly available information:
- The Electoral Register from Local Authorities
  - County Court Judgments from Registry Trust
  - Bankruptcy (and other similar orders) from the Insolvency Service.
- ▶ Fraud information may also come from FPAs.
- ▶ Credit information comes from information on applications to banks, building societies, credit card companies etc and also from the conduct of those accounts.

**Q: How will I know if my information is to be sent to a CRA or FPA?**

**A:** You will be told when you apply for an account if your application data is to be supplied. The next section of this leaflet will tell you how, when and why we will search at CRAs and FPAs and what we will do with the information we obtain from them. We will also tell you if we plan to send payment history information on you or your business, if you have one, to CRAs. You can ask at any time the name of CRAs and FPAs.

**Q: Why is my data used in this way?**

**A:** We and other organisations want to make the best possible decisions we can, in order to make sure that you, or your business, will be able to repay us. Some organisations may also use the information to check your identity. In this way we can ensure

that we all make responsible decisions. At the same time we also want to make decisions quickly and easily and, by using up-to-date information, provided electronically, we are able to make the most reliable and fair decisions possible.

**Q: Who controls what such agencies are allowed to do with my data?**

**A:** All organisations that collect and process personal data are regulated by the Data Protection Act 1998, overseen by the Information Commissioner's Office. All CRAs are in regular dialogue with the Commissioner. Use of the Electoral Register is controlled under the Representation of the People Act 2000.

**Q: Can just anyone look at my data held at CRAs?**

**A:** No, access to your information is very strictly controlled and only those that are entitled to do so, may see it. Usually that will only be with your agreement or (very occasionally) if there is a legal requirement.

<sup>1</sup> A financial associate will be someone with whom you have a personal relationship that creates a joint financial unit in a similar way to a married couple. You will have been living at the same address at the time. It is not intended to include temporary arrangements such as students or rented flat sharers or business relationships.

<sup>2</sup> A small business is defined as an organisation which might be a sole trader, partnership or a limited company that has three or less partners or directors.

<sup>3</sup> CRAs may link together the records of people that are part of a financial unit. They may do this when people are known to be linked, such as being married or have jointly applied for credit or have joint accounts. They may also link people together if they, themselves, state that they are financially linked.

<sup>4</sup> Financial associates (see section 1) may "break the link" between them if their circumstances change such that they are no longer a financial unit. They should apply for their credit file from a CRA and file for a "disassociation".

# READ THIS SECTION VERY CAREFULLY, IT WILL VARY FROM LENDER TO LENDER

## What does Wesleyan Bank do?

### 1. When you apply to us to open an account, this organisation will do the following.

- ▶ Check our own records for information on:
  - your personal accounts;
  - and, if you have one, your financial associates' personal accounts; and
  - if you are an owner, director or partner in a small business<sup>2</sup> we may also check on your business accounts.
- ▶ Search at CRAs for information on:
  - your personal accounts;
  - your financial associates' personal accounts (if you are making a joint application, if you have previously made a joint application, if you have a joint account, or if you are financially linked<sup>3</sup>);
  - your business accounts (if you are a director or partner in a small business).

Very occasionally, if there is insufficient information to enable us to assist you, we may also use information about other members of your family.
- ▶ Search at fraud prevention agencies for information on you and any address at which you have lived and on your business (if you have one).

### 2. When you supply us with information as part of the application, we will do the following.

- ▶ Send the information to the CRAs.
- ▶ If you are making a joint application or tell us that you have a spouse or financial associate, we will:
  - search, link and/or record information at CRAs about you both;
  - link any individual identified as your financial associate, in our own records;
  - take both your and their information into account in future applications by either or both of you;
  - continue this linking until the account closes, or is changed to a sole account and one of you notifies us that you are no longer linked.

**You must make sure that you have a joint applicant's, spouse's or financial associate's agreement to disclose information about them.**

- ▶ If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to fraud prevention agencies and other organisations involved in crime and fraud prevention.
- ▶ Your data may also be used by this organisation to offer you other products, but only if you have given your permission. This consent will be on the front of any form that you have completed.

### 3. With the information that we obtain we will do the following.

- ▶ Assess this application for credit.
- ▶ Check details on applications for credit and credit-related or other facilities.
- ▶ Verify your identity and the identity of your spouse, partner or other directors/partners.
- ▶ Undertake checks for the prevention and detection of crime, fraud and/or money laundering.
- ▶ Use scoring methods to assess this application and to verify your identity.
- ▶ Manage your personal and/or business account (if you have one) with ourselves.
- ▶ Undertake periodic statistical analysis or testing to ensure the accuracy of existing and future products and services.

Any or all of these processes may be automated.

### 4. When you have an account we will do the following.

- ▶ Where you borrow or may borrow from us, we will give details of your personal and/or business account (if you have one), including names and parties to the account and how you manage it/ them to CRAs.
- ▶ If you borrow and do not repay in full and on time, we will tell CRAs.
- ▶ We may make periodic searches of our own group records and at CRAs to manage your account with us, including whether to make credit available or to continue or extend existing credit. We may also check at FRAs to prevent or detect fraud.
- ▶ If you have borrowed from us and do not make payments that you owe us, we will trace your whereabouts and recover debts.

## What do CRAs and FPAs do?

### 5. When CRAs receive a search from us they will do the following.

- ▶ Place a search “footprint” on your credit file whether or not this application proceeds. If the search was for a credit application the record of that search (but not the name of the organisation that carried it out) may be seen by other organisations when you apply for credit in the future.
- ▶ Link together the records of you and anyone that you have advised is your financial associate including previous and subsequent names of parties to the account. Links between financial associates will remain on your and their files until such time as you or your partner successfully files for a disassociation<sup>4</sup> with the CRAs.

### 6. They will give us the following.

- ▶ Credit information such as previous applications and the conduct of the accounts in your name and of your associate(s) (if there is a link between you – see section 1 above) and/or your business accounts (if you have one).
- ▶ Public information such as County Court Judgments (CCJs) and bankruptcies.
- ▶ Electoral Register information.
- ▶ Fraud prevention information.

### 7. When information is supplied by us, to them, on your account(s) CRAs will do the following.

- ▶ Record the details that are supplied on your personal and/or business account (if you have one) including previous and subsequent names that have been used by the account holders and how you manage it/them.
- ▶ If you borrow and do not repay in full and on time, they will record the outstanding debt.

Records shared with CRAs remain on file for six years after they are closed whether settled by you or defaulted.

### 8. How your data will NOT be used by CRAs.

- ▶ It will not be used to create a blacklist.
- ▶ It will not be used by the CRA to make a decision.

### 9. How your data WILL be used by CRAs.

The information which we and other organisations provide to the CRAs about you, your financial associates and your business (if you have one) may be supplied by CRAs to other organisations and used by them to:

- ▶ prevent crime, fraud and money laundering by, for

example, checking details provided on applications for credit and credit-related or other facilities;

- ▶ check the operation of credit and credit-related accounts;
- ▶ verify your identity if you or your financial associate applies for other facilities;
- ▶ make decisions on credit and credit-related services about you, your partner, other members of your household or your business;
- ▶ manage your personal, your partner’s and/or business (if you have one) credit or credit-related account or other facilities;
- ▶ trace your whereabouts and recover debts that you owe;
- ▶ undertake statistical analysis and system testing.

### 10. How your data may be used by FPAs.

The information which we provide to the fraud prevention agencies about you, your financial associates and your business (if you have one) may be supplied by fraud prevention agencies to other organisations and used by them and us to do any of the following.

- ▶ Prevent crime, fraud and money laundering by:
  - checking details provided on applications for credit and credit-related or other facilities;
  - managing credit and credit-related accounts or facilities;
  - cross checking details provided on proposals and claims for all types of insurance;
  - checking details on applications for jobs or when checked as part of employment.
- ▶ Verify your identity if you or your financial associate applies for other facilities including all types of insurance proposals and claims.
- ▶ Trace your whereabouts and recover debts that you owe.
- ▶ Conduct other checks to prevent or detect fraud.
- ▶ Undertake statistical analysis and system testing.

### 11. What we process and share with FPAs

The personal data you have provided, we have collected from you, or we have received from third parties may include your:

- ▶ name
- ▶ date of birth
- ▶ residential address and address history
- ▶ contact details such as email address and telephone numbers

- ▶ financial information
- ▶ employment details
- ▶ identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- ▶ vehicle details

When we and fraud prevention agencies process your personal data, we do so on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.

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

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

### Automated decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if:

- ▶ our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or
- ▶ you appear to have deliberately hidden your true identity

You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

### Consequences of processing

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.

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, financing or employment to you. If you have any questions about this, please contact us on the details above.

### Data transfers

Whenever fraud prevention agencies transfer your

personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

### Your rights

Your personal data is protected by legal rights, which include your rights to:

- ▶ object to our processing of your personal data
- ▶ request that your personal data is erased or corrected
- ▶ request access to your personal data

For more information or to exercise your data protection rights, please contact us using the contact details above.

If you are unhappy about how your personal data has been used, please refer to our complaints policy which is available on our website at [www.wesleyanbank.co.uk](http://www.wesleyanbank.co.uk). You also have a right to complain to the Information Commissioner's Office [ico.org.uk/](http://ico.org.uk/), which regulates the processing of personal data.

### 12. How your data may be used in other ways.

- ▶ Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.
- ▶ Your data may also be used to offer you other products, but only if you have given your permission.

### How to find out more

You can contact the CRAs currently operating in the UK. The information they hold may not be the same so it is worth contacting them all. They will charge you a small statutory fee.

- ▶ CallCredit, Consumer Services Team, PO Box 491, Leeds LS3 1WZ or call 0870 0601414
- ▶ Equifax PLC, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS or call 0800 014 2955 or log on to [www.equifax.co.uk](http://www.equifax.co.uk)
- ▶ Experian, Customer Support Centre, PO Box 9000, Nottingham, NG80 7WF or call 0344 481 8000 or log on to [www.experian.co.uk](http://www.experian.co.uk).

# WESLEYAN

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## Being a mutual is the bedrock of what Wesleyan does.

It is integral to how we think about our business and the way we look after our members, customers and our communities.

We believe mutuality has many advantages. It allows us to put our members and customers at the heart of all we do - rather than shareholders and the need to maximise short term profit - meaning we are able to focus on what's right for those who invest in our business. Not just for today, but for the long term.

For over 175 years our mutual status has served us well, and we have no doubt it will continue to do so for many years to come.

The Wesleyan Group of companies provides advice and solutions on a wide range of products and services to meet both the personal and business needs of our customers.

### For you



Savings



Mortgages



Investments



Insurance



Retirement  
planning



Personal  
loans



Life & income  
protection

### or your business



Finance &  
funding



Personal  
protection



Equipment  
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Staff  
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For more information about the Wesleyan Group of companies, visit [wesleyan.co.uk/legal-disclaimer](https://www.wesleyan.co.uk/legal-disclaimer)

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