

Website Privacy Policy

Effective from November 2019

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1. Our privacy policy

We take our obligations under data protection law very seriously and we're committed to keeping your personal data private and secure. This policy is designed to help you understand what personal data we hold, why it is required, and how it is used.

This policy is for visitors to our website only. If you are a customer then we collect and use information about you in accordance with our product specific privacy policies, which can also be found on the Privacy Policy page of our website.

2. About us

In this privacy policy, the terms "we", "our", and "us" are used to refer to one of the following: Kent Reliance, Kent Reliance Property Loans, Reliance Property Loans Limited, Prestige Finance Limited, Heritable Development Finance Limited, InterBay Funding Limited, InterBay Asset Finance Limited, InterBay ML Limited, 5D Finance Limited, Rochester Mortgages Limited, Jersey Home Loans Limited or Guernsey Home Loans Limited. Each of these is a trading name, subsidiary or part-owned subsidiary of OneSavings Bank Plc (Company Number 7312896), a company registered in England and Wales and whose registered office is Reliance House, Sun Pier, Chatham, Kent ME4 4ET. OneSavings Bank Plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (registered number 530504). We subscribe to the Financial Services Compensation Scheme and the Financial Ombudsman Service.

We respect your right to privacy. If you have any questions about how we use your information, then please write to: Group Data Protection Officer, OneSavings Bank, Sunderland, SR43 4AB. Alternatively, you can email us at: dataprotection@osb.co.uk

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

3. What personal data do we use?

As a visitor to our site, we may collect and process any personal information that you voluntarily submit to us through the site. This may include for example, online correspondence you send us about our products and services, as well as your contact details so we can contact you for support, marketing or other purposes. In addition, we may also collect anonymous information about visitors to our site and the resources they access, so that we can make sure the site is meeting our and our customers' needs.

4. What do we use personal data for?

We use information held about you in the following ways:

- to deal with your enquiries and requests (e.g. complaints handling);
- to analyse, assess and improve the popularity and viability of our products as well as to identify potential customers of new products;
- to tell you about products and services (including those of others) that may be of interest to you; and
- for statistical analysis and analytics.

5. What are our legal grounds for holding personal data?

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this privacy policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. We rely on the following legal grounds in order to process your data:

- **We have obtained your consent**

We may provide you with certain marketing information about third party services or products where you have provided your explicit consent for us to do so. Please note that we may also use your personal information in order to provide certain marketing information for the same or similar services you have previously used. You can ask us to stop or start sending you marketing messages at any time by contacting us.

By using our website, you also consent to our use of cookies (see Use of Cookies below). You can restrict or block the cookies which are set by us through your browser settings.

- **Processing of your data is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are outweighed by your interests, fundamental rights and freedoms**

To use your information for other than on the basis of your consent we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your information as it provides us with the information that we need to deal with your enquires or requests or to help us improve our website. Effectively, this requires us to carry out a balancing test of our interests in using your information against the interests you have as a citizen and the rights you have under data protection laws. The outcome of this balancing test will determine whether we can use your information in the ways described in this privacy policy (except in relation to certain marketing activities, where as noted above we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

6. Who do we share personal data with?

We may share your personal information with related entities and affiliates, which means One Savings Bank Plc's subsidiaries, and its ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- our affiliates and selected third parties, where you have consented to receiving marketing from us/third parties;
- third party suppliers, service providers and/or legal advisers to the extent they assist us with our legal/regulatory obligations;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes;
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties;
- our regulators, law enforcement bodies, credit reference agencies, fraud prevention agencies, the courts or any other authorised bodies, to the extent that we are legally required to.

We may disclose your personal information to third parties:

- in the event that you require us to;
- in the event that we consider selling or buying any business or assets, in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of OneSavings Bank plc or any of its group entities;
- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- in order to enforce or apply our website or service terms;
- to protect the rights, property, or safety of us, our staff, our customers, or others; and

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements.

7. Where is personal data stored and sent?

All information which you provide to us is stored on our secure servers, and our customer databases are stored in the UK.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (the “EEA”). In particular, we have an operations centre in India and we engage third parties that may process personal data outside of the EEA. Your personal data may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

In particular, when we send personal data overseas, we will make sure suitable safeguards are in place, in accordance with European data protection requirements, to protect the data. In all cases these safeguards will be one of the following:

- Sending the data to a country that’s been approved by the European authorities as having a suitably high standard of data protection law.
- Putting in place a contract with the recipient containing terms approved by the European authorities as providing a suitable level of protection.
- Sending the data to an organisation which is a member of a scheme that’s been approved by the European authorities as providing a suitable level of protection. One example is the “Privacy Shield” scheme agreed between the European and US authorities.

More information on these safeguards can be found here: https://ec.europa.eu/info/law/law-topic/data-protection_en

How long is personal data kept for?

We will retain information about you for the period necessary to fulfil the purposes for which the information was collected. After that, we will delete it. The retention period will vary depending on the purposes for which the information was collected. We are sometimes legally obliged to retain the information, for example, for tax and accounting purposes. In the absence of a specific legal or regulatory requirement to retain your data we typically retain it for the applicable legal limitation period for bringing legal claims. This is six years where the claim arises from a simple contract.

8. Your rights

You have a number of rights under data protection law in relation to the way we process your personal data. These are set out below. You may contact us using the details on our site (or by contacting our DPO directly – details below) to exercise any of these rights, and we will respond to any request received from you within one month from the date of the request.

Please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer in the first instance. Our DPO can be contacted at Group Data Protection Officer, OneSavings Bank, Sunderland, SR43 4AB or by email at dataprotection@osb.co.uk.

Right	Description
Right to be informed	A right to be informed about how we collect and use your personal data.
Right of access	A right to access personal data held by us about you.
Right to rectification	A right to require us to rectify any inaccurate personal data held by us about you.
Right to erasure	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with the right to object below).
Right to restrict processing	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right to data portability	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right to object	A right to object to our processing of personal data held by us about you in certain circumstances (including where the processing is necessary for the purposes of the legitimate interests pursued by us or a third party). You also have the right to withdraw your consent, where we are relying on it to use your personal data; or ask us to stop processing your data for direct marketing purposes.
Rights related to automated decision making including profiling	A right not to be subject to a decision based solely on automated processing (without any human involvement), including profiling, in certain circumstances. Please note that we do not presently undertake automated decision-making within the scope of this right.

If you have any concerns regarding our processing of your personal data, or are not satisfied with our handling of any request by you in relation to your rights, you also have the right to make a complaint to the Information Commissioner’s Office. Their address is:

First Contact Team
Information Commissioner’s Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

9. Use of cookies

Cookies are small text files that web servers can store on your computer's hard drive when you visit a website. They allow the server to recognise you when you revisit the website and to tailor your web browsing experience to your specific needs and interests. If you wish to restrict or block the cookies which are set by us, you can do this through your browser settings.

For more information on our use of cookies, please see our Cookies Policy which can also be found on our website.

10. Links to third party sites

Our site may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. Changes to our privacy policy

We may update this privacy policy from time to time. Any changes we may make in the future will be posted on our website and we recommend that you revisit our Privacy Policy page from time to time to stay informed about how we use your information.

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Last updated: November 2019

For customer service and training purposes, calls with Heritable may be monitored and/or recorded.

Heritable Development Finance Limited is a company registered in England and Wales (company number 08606584), whose registered office is Reliance House, Sun Pier, Chatham, Kent ME4 4ET. Heritable Development Finance is part of the OneSavings Bank plc group. OneSavings Bank plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (registered no. 530504).