

Using My Personal Data SLB

July 2021

1. How we use your personal data

When you apply for a financial service with Santander London Branch ('SLB'), on behalf of an entity you represent, you can access a Data Protection Statement explaining how we treat your personal data. This is available at

https://www.santander.com/csgs/Satellite/CFWCSancomQP01/en_GB/Corporate/Shareholders-and-Investors/General-information/Banco-Santander-London-Branch.html

This document provides you with further information and details of your personal data rights under the United Kingdom General Data Protection Regulation (UK GDPR) and the UK Data Protection Act 2018 (DPA 2018).

2. SCIB Data Protection Statement explained

Data Protection Statement section	Explanation
Introduction	<p>This section sets out who the Data Controller is and provides contact details for the Data Protection Officer.</p> <p>In legal terms Santander London Branch is designated as the Data Controller because it is the entity that (either alone or jointly with others) determines the purposes and means of processing my personal data.</p> <p>If you have any questions about how your personal data is used, or the information included in this document, the Data Protection Officer (DPO) can be contacted at 2 Triton Square, Regents Place, London, NW1 3AN.</p>
The types of personal data we collect and use	<p>The type of personal data we collect and use will vary depending on the services you require or have and the nature of your relationship with us for example if you are a Director or Shareholder of the client company.</p>
Providing your personal data	<p>This section states that you will be told whether the provision of your personal data is optional or mandatory.</p> <p>If provision of the data is mandatory then you will need to provide the information so that we can process your application and provide the service you require.</p>
Monitoring of communications	<p>This section explains why we may monitor or record your on-going communications with us, for example; calls, emails and text messages.</p> <p>We monitor our communications with you so that we comply with regulatory rules and our own internal processes or protocols. We do this:</p> <ul style="list-style-type: none">■ Where it is relevant to the services we provide;■ To prevent or detect crime;■ In the interests of protecting the security of our communications systems and procedures;■ For quality control and staff training purposes; and■ When we need to access these as a record of what we have said to you/what you have said to us. For example, where we are required by Financial Conduct Authority (FCA) regulations to record certain telephone lines, we will do so. <p>Our monitoring will also check for obscene or profane content in communications.</p> <p>In very limited circumstances we may conduct short-term and carefully controlled monitoring of activities on your service. This will only be done where this is justified by our legitimate interests, or to comply with legal obligations - for example, if we have reason to believe that a fraud or other crime is being committed, and/or where we suspect non-compliance with anti-money laundering regulations to which we are subject.</p>

Data Protection Statement section	Explanation
Using your personal data: the legal basis and purposes	<p>This section describes how your personal data may be used, and the legal basis for the processing of your information.</p> <p>The legal basis for us processing or analysing your personal data will depend on what we're trying to achieve.</p> <p>Data Protection legislation allows us to process your personal data for our own legitimate interests - provided those interests do not override your own interests and/or your fundamental rights and freedoms.</p> <p>An example of 'legitimate interests' would be where we share your personal data within the Santander group for administrative purposes.</p> <p>Complying with established legal obligations is another reason for us to share your personal data. For example where we are required to provide periodic reporting to regulators.</p> <p>You may also give your consent for us to process personal data at your request, an example of this would be where you ask us to pass your personal data to a third party which is acting on your behalf to provide you with a service.</p> <p>Under Data Protection legislation you can withdraw your consent at any time. Withdrawal of consent may affect our ability to fulfil your request, as in the previous example, but will not affect our ability to deliver the service you have applied for where processing is based on your/our legitimate interests, our legal/ regulatory obligation, or it is necessary to perform a contract with you.</p>
Sharing of your personal data	<p>This section details when personal data may be shared and the types of people/organisations it can be shared with.</p> <p>We may share your personal data with the Santander group of companies and other persons providing services to us. This may include data back-up and server hosting providers, our IT software and maintenance providers and/or their agents.</p> <p>Further details of who we may share your personal data with are contained in the SLB Data Protection Statement available at:</p> <p>https://www.santander.com/csgs/Satellite/CFWCSancomQP01/en_GB/Corporate/Shareholders-and-Investors/General-information/Banco-Santander-London-Branch.html</p> <p>Santander London Branch is a branch of Banco Santander, S.A.</p> <p>The Santander Group companies that you may share personal data with include</p> <ul style="list-style-type: none"> ■ Banco Santander, S.A.; ■ Santander Corporate & Investment Banking is a brand name used by Banco Santander, S.A., and its affiliates including Santander UK plc; <p>You have the right to object to the sharing of your personal data where this sharing is based on your consent or in certain circumstances where the processing is based on our legitimate interests.</p>
International transfers	<p>This section explains that where we transfer your personal data outside of the UK appropriate safeguards will be put in place to protect that data.</p> <p>Safeguards can include:</p> <ul style="list-style-type: none"> (i) The Standard Data Protection Clauses (also known as Model Clauses). (ii) Binding Corporate Rules, provided the recipients in other countries have obtained the requisite approvals. The published list of approvals is available here: https://ico.org.uk/for-organisations/binding-corporate-rules/ or from our Data Protection Officer (DPO).
Data anonymization and aggregation	<p>Your personal data may be converted into statistical or aggregated data, which can't be used to identify you. We may share and sell such anonymised data including in an aggregated format, within and outside of the Santander group of companies, for statistical analysis, research and other business purposes. For example, sharing information about general spending trends in the UK to assist in research. The law says this is not considered to be personal information after it has been anonymised and/or aggregated.</p>
Identity verification and fraud prevention checks	<p>This section explains that your personal data can be used to check your identity and for fraud prevention and anti-money laundering purposes.</p> <p>This section provides links to the Credit Reference Agency Information Notice (CRAIN) document.</p> <p>To find out more, refer to the 'Fraud prevention agencies explained' section of this document.</p>

Data Protection Statement section	Explanation
Automated decision making and processing	<p>This section explains what automated decision making and processing is and our approach.</p> <p>Automated decision making involves processing your personal data without human intervention to evaluate certain personal aspects about you (known as profiling). In particular, we may analyse or predict (among other things) your economic situation, personal preferences, interests or behaviour.</p> <p>Santander London Branch does not undertake automated decision making or processing.</p>
My marketing preferences	<p>This section tells me how you may use my information for marketing and market research purposes.</p> <p>Santander London Branch will only contact you regarding information on our corporate products we believe may be of interest to you via the business contact details (e.g. email, address or telephone number) you have provided. You can tell us at any time if you do not want to receive such marketing or market research requests.</p>
Criteria used to determine retention periods	<p>If you open an account or service with us, your information will be kept after your account or service is closed in accordance with our record retention policy.</p> <p>Further information can be found in our Data Protection Statement.</p>
Your rights under applicable Data Protection law	<p>This section lists the various data protection rights that you have.</p> <p>Your personal data is protected under Data Protection legislation, and as a consequence you have a number of rights that you can enforce against us as your Data Controller.</p> <p>Please note that these rights do not apply in all circumstances. Your rights include:</p> <ul style="list-style-type: none"> ■ The right to be informed - including about how we might process your personal data. This information is contained in the Data Protection Statement. ■ To have your personal data corrected if it is inaccurate and to have incomplete personal data completed in certain circumstances. ■ The right in some cases to object to processing of your personal data. This right allows you to object to processing based on legitimate interests, direct marketing and processing for purposes of statistics, including the anonymization of your personal data for statistical and aggregated use. ■ The right to restrict processing of your personal data by blocking or suppressing processing in the following circumstances: Where you contest the accuracy of the personal data, you can request we restrict processing until you have verified the accuracy of the personal data. Where you have objected to processing and we are considering whether our legitimate interests override yours. Where our processing of your personal data was unlawful but you wish us to restrict processing instead of erasing the data. Where we no longer need the personal data but you ask us to retain it in connection with establishing, exercising or defending a legal claim. ■ The right to have your personal data erased in certain circumstances (also known as the 'right to be forgotten'). This right is not absolute – it applies only in particular circumstances, where it does not apply any request for erasure will be rejected. Circumstances when it might apply include: where the personal data 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 subsequently withdraw; when there is no overriding legitimate interest for continuing the processing; if the personal data is unlawfully processed; or if the personal data has to be erased to comply with a legal obligation. <p>Requests for erasure will be refused where its retention is lawful and permitted under Data Protection law, for instance where the personal data has to be retained to comply with legal obligations, or to exercise or defend legal claims.</p> <ul style="list-style-type: none"> ■ To request access to the personal data held about you and to obtain certain prescribed information about how we process it. This is more commonly known as submitting a 'data subject access request'. This right will enable you to obtain confirmation that your personal data is being processed, to obtain access to it, and to obtain other supplementary information about how it is processed. In this way you can be aware of, and you can verify, the lawfulness of our processing of your personal data. ■ To move, copy or transfer certain personal data. Also known as 'data portability'. You can do this where we are processing your personal data based on consent or a contract and by automated means. Please note that this right is different from the right of access (see above), and that the types of data you can obtain under these two separate rights may be different. You are not able to obtain through the data portability right all of the personal data that you can obtain through the right of access. ■ Rights in relation to some automated decision-making about you, including profiling. Santander Corporate & Investment Banking do not undertake automated decision making or processing therefore this right is not applicable to our clients. <p>You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent body empowered to investigate whether we are complying with the Data Protection law. You can do this if you consider that we have infringed the legislation in any way. You can visit ico.org.uk for more information.</p> <p>If you wish to exercise any of your rights against us, we will explain whether or not that or those rights do or do not apply to you with reference to the above, and based on the precise circumstances of your request.</p>

3. Fraud prevention agencies explained

Before we provide a financial service to you, we are required to undertake a number of checks - not only to verify your identity, but also to prevent fraud or money laundering. These checks require us to process your personal data.

What we process and share

The personal data we process and share includes data you have provided to us and/or data we have received from third parties. This may include your:

- Name
- Date of birth
- Business and residential address and address history
- Contact details, such as corporate email addresses and telephone numbers
- Tax and passport numbers
- Financial information
- Employment details
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address

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

FPA's 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.

3.1 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, goods or 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 to you.

3.2 Automated decision making and profiling

The Data Protection legislation has provisions on:

- Automated individual decision-making (making a decision solely by automated means without any human involvement); and
- Profiling (automated processing of personal data to evaluate certain things about an individual). Santander London Branch does not use automated decision making or profiling.

3.3 Data transfers

Where fraud prevention agencies transfer my personal data outside of the UK, they impose contractual obligations on the recipients of that data, in order to protect your personal data to the standard required in the UK. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

For more information about the fraud prevention agencies that we use, and how they will process your personal data, please contact:

The Compliance Officer

Cifas

6th Floor, Lynton House
7-12 Tavistock Square
London
WC1H 9LT

Email: compliance@cifas.org.uk

Website: cifas.org.uk/privacy-notice

The Compliance Officer

National Hunter

PO Box 2756
Stoke on Trent
Staffordshire
ST6 9AQ

Website: nhunter.co.uk/howitworks/

The Compliance Officer

National Cira

Sinectic Solutions Limited
Sinectics House
The Brampton
Newcastle under Lyme
ST5 0QY

Website: synectics-solutions.com/Data-Protection

4. Credit reference agencies explained

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 Credit Reference Agency Information Notice (CRAIN) document, which can be accessed via any of the following links:

- experian.co.uk/crain
- equifax.co.uk/crain
- transunion.co.uk/crain

5. Your personal data rights explained

Your personal data is protected under Data Protection legislation, and as a consequence you have a number of rights that you can enforce against us as your Data Controller. When sending personal data to us we strongly advise you to secure your communication e.g. by password protecting email attachments.

Right to be Informed	The right to be informed means you must provide me information about how you process my personal information. You do this through this document and the Data Protection Statement.
Contact	https://www.santander.com/csgs/Satellite/CFWCSancomQP01/en_GB/Corporate/Shareholders-and-Investors/General-information/Banco-Santander-London-Branch.html
Right to Rectification	The right to have my personal data corrected if it's inaccurate, or to have any incomplete personal data completed.
Contact	My Relationship Manager Your Privacy Team at slbprivacy@santandercib.co.uk
Right to Object	The right to object to processing of my personal data based on legitimate interests, direct marketing and processing for purposes of statistics.
Contact	My Relationship Manager Your Privacy Team at slbprivacy@santandercib.co.uk
Right to Restrict Processing	The right to restrict processing of my personal data by blocking or suppressing processing in certain circumstances (I can see section two for further detail).
Contact	My Relationship Manager Your Privacy Team at slbprivacy@santandercib.co.uk
Right to Erasure	Also known as the Right to be Forgotten, the broad principle underpinning this right is to enable me to request the deletion or removal of my personal data where there is no compelling reason for its continued processing.
Contact	My Relationship Manager Your Privacy Team at slbprivacy@santandercib.co.uk
Right of Access	<p>The right to access my personal data and supplementary information. This right also allows me to be aware of and verify the lawfulness of the processing.</p> <p>My request must be submitted in writing to the address below using the Data Subject Access Request form or via a signed letter containing the following information</p> <ul style="list-style-type: none"> ■ My full name ■ Date of birth ■ Address and previous address where relevant ■ A daytime phone number in case you need to contact me to discuss my request ■ My client reference number ■ My relationship with you for example if I am a director or shareholder of the entity I represent ■ Any other relevant information
Contact	Subject Access Requests, Data Protection Officer, Santander London Branch, 2 Triton Square, Regents Place, London, NW1 3AN
Right to Data Portability	The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
Contact	My Relationship Manager Your Privacy Team at slbprivacy@santandercib.co.uk

6. Glossary of terms

Binding Corporate Rules

Personal Data Protection policies which are adhered to by a controller or processor established on UK for transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or a group of enterprises engaged in a joint economic activity.

Data Controller

The natural or legal person, public authority, agency or other body which alone or jointly with others, determines the purposes and means of the processing of personal data.

Data Protection Officer

A person charged with advising the controller or processor on compliance with Data Protection legislation and assisting them to monitor such compliance.

Legal Basis

The legal basis for processing personal data.

Legitimate interest

The lawful grounds for data processing. Necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject.

Personal data

'Personal data' means any information relating to an identified or identifiable natural person ('Data Subject'). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his or her physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.