

# How Nationwide uses your information

# Contents

---

<b>Introduction</b>	Page 2
<b>Who collects and uses your information?</b>	Page 2
<b>What information does Nationwide collect and hold?</b>	Page 3
<b>Where does Nationwide collect information from?</b>	Page 3
<b>How does Nationwide use your information?</b>	Page 5
<b>Checking your identity and confirming it is you</b>	Page 5
<b>Helping to manage your accounts and relationship with us</b>	Page 6
<b>Checking your credit reference and making sure products and services are affordable</b>	Page 10
<b>Preventing financial crime</b>	Page 11
<b>Providing products and services from our partners</b>	Page 12
<b>Helping in challenging times and with debt recovery</b>	Page 13
<b>Sharing relevant marketing about products and services</b>	Page 16
<b>Meeting our legal and regulatory obligations</b>	Page 17
<b>Enhancing your experience and our products and services</b>	Page 18
<b>Testing and improving products, services and systems</b>	Page 20
<b>Who might we need to share your information with?</b>	Page 20
<b>Sending your information outside the UK</b>	Page 21
<b>How long do we keep your information?</b>	Page 21

---

<b>What are your rights around your personal information?</b>	Page 22
1. The right to access your information	Page 22
2. The right to rectify your information	Page 22
3. The right to restrict how we use your information	Page 22
4. The right to object to how we use your information	Page 23
5. The right to erase your information	Page 23
6. The right to transfer your information	Page 23
7. The right to human intervention	Page 24
8. The right to complain to the regulator	Page 24
9. To withdraw your consent	Page 24

---

<b>Collecting 'special category' and sensitive personal information</b>	Page 24
---	---------

---

<b>Automated decision making</b>	Page 27
----------------------------------	---------

---

<b>Using your information when you're not a Nationwide customer</b>	Page 28
---	---------

---

<b>Updating your personal information</b>	Page 29
---	---------

---

<b>Managing different addresses</b>	Page 29
-------------------------------------	---------

---

<b>Your email addresses and phone numbers</b>	Page 30
---	---------

---

<b>Managing contact details with our partners</b>	Page 30
---	---------

---

<b>Contacting the Data Protection Officer</b>	Page 30
---	---------

---

<b>When we use CCTV</b>	Page 30
-------------------------	---------

---

<b>Cookies</b>	Page 31
----------------	---------

---

<b>Updating this notice</b>	Page 31
-----------------------------	---------

## Introduction

This leaflet tells you about how, why and when we use your personal information. Protecting your privacy is our priority and we're committed to taking good care of any data that you share or we collect. If you have any questions about this, don't hesitate to get in touch. We'll be more than happy to help.

As a building society, we're big on trust. We will always:

- Look after your personal information with the same care that we do your finances.
- Use robust security processes to keep your personal details safe and sound.
- Keep your best interests at heart and be transparent about how we use your information.

If after you've had a read, you're still curious to find out more, just head over to [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

## Who collects and uses your information?

Under data protection law, an organisation that decides how the personal information it collects and holds is used is called a 'data controller'. We call this use of personal information 'processing'. If you're a member or customer of Nationwide Building Society, the data controller of your personal information is Nationwide Building Society.

Nationwide Building Society has a number of subsidiary companies and overseas branches and is a member of various limited liability partnerships. These include Virgin Money (UK) plc, Nationwide Covered Bonds LLP, The Mortgage Works (UK) plc, E-Mex Home Funding Ltd and Derbyshire Home Loans Lts.

In some cases, one of these companies or partnerships will be the data controller.

When we say 'Nationwide', 'we', 'us' or 'our', we mean the Nationwide business that is the data controller of your personal information.

# What information does Nationwide collect and hold?

The information we might collect and hold about you includes:

- Personal information to identify and contact you, such as your name, address, contact details and date of birth. We also rely on biometric information, which may be held by our trusted third parties, like your fingerprint or a biometric map of your face.
- Information about your work or profession, your nationality, education and social and economic demographic.
- Details of the accounts and products you hold and/or previously held with us, and how you use them.
- Information about your financial position and history, which may include source of funds and wealth.
- Details of payments made to and from your accounts, and any insurance claims you make.
- Details of products with other providers that you've told us about or we've sold to you.
- Personal information gathered from when you've applied for a product or service, including where an application was declined.
- Details of when you contact us and when we contact you and access certain services (eg our banking app).
- Details of the type of device you are using (e.g. whether it's an Apple phone or a Windows computer) and when you use our banking app, how you interact with your device (e.g. the way you uniquely scroll).
- Information on your location, gathered from your mobile phone or other devices, where you access the internet or where you make a payment.
- Details of how you use our website, banking app and online services.
- Details you make public on social media e.g. Facebook/Twitter.
- Information about your interactions with Nationwide in branch, online or by telephone.
- Other information that you supply to us or that we obtain from our relationship with you. For example, information relevant to an insurance claim you make or about your marketing preferences. This could include sensitive information (e.g. something you tell us about your health – we call this 'special category data').

When we talk about 'information' throughout this leaflet, we're referring to all of the above.

# Where does Nationwide collect information from?

## Information we collect directly from you

Most of the information we hold about you comes directly from you. This includes information you give us when:

- You apply for our products or services.
- You update your information (such as when you change your address).
- You visit us in branch.
- You speak to us on the phone (we may record some calls for training and quality purposes).
- You use our websites, Internet Bank, banking app or web chat services, including the MyNationwide app.
- You send us letters, emails or other documents.

Sometimes, we might use other information in addition to this. For example, information about your account activities (e.g. details of payments you've made). In certain situations, we may use information that you've made public such as tweets or social media content too (e.g. when you interact with our social media profiles, like @AskNationwide on Twitter, or reference Nationwide in a tweet).

## **Information we gather from third parties**

We might collect or receive information from certain third parties too. These include:

- Credit reference agencies
- Government bodies and agencies
- HM Revenue & Customs and other tax authorities
- Regulators
- Law enforcement agencies
- Fraud prevention agencies
- Insurers
- The Electoral Roll and other sources of publicly available information (e.g. Sanctions list, media)
- Our service providers
- Companies and organisations that introduce you to us
- Financial advisers
- Land agents
- Card associations
- Retailers
- Comparison websites
- Market research providers
- Tracing and debt recovery agents
- Organisations providing data services to support us in managing our relationship with you and operating our business.

## **Information gathered from people acting on your behalf**

Sometimes, we'll need to collect information from people acting on your behalf. This could be from a joint applicant on an account you hold, a trustee, a parent, guardian or someone who holds a Power of Attorney. If someone acting on your behalf provides this information, we'll record what's been provided and who gave it to us.

In the event you're providing information about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we may process their details.

Find out more about this in the '**Using your information when you're not a Nationwide customer**' section.

# How does Nationwide use your information?

## Examples of how we use your information

We collect and use your information so we can open and manage your accounts, provide services and also operate our business. Examples of how we use your information include:

- to check your identity and confirm that it is you.
- to manage your accounts and relationship with us.
- to check your credit reference and make sure products are affordable.
- to confirm your income and outgoings.
- to prevent and detect fraud and financial crime.
- to provide products and services of our partners.
- to help you in challenging times and for debt recovery.
- to enhance your experience and our products and services.
- to share relevant marketing about our products and services.
- to meet our legal and regulatory obligations.
- to test our systems and processes.

## When we can use your information

We're able to use your information for the purposes outlined above, where one of the following applies:

- We use the information to carry out our obligations to you, as part of an agreement between you and Nationwide.
- We must use the information to comply with the law or in the public interest.
- We use the information to carry out our legitimate business interests.
- You have given us consent to use the information.
- We use your information to protect your vital interests (e.g. in very exceptional circumstances when we believe it's in your best interests).

You'll find out more about how we use your information in the sections below.

## Checking your identity and confirming it is you

We collect and use your personal information to check your identity when you open an account, product or service with us, and from time to time throughout our relationship. When you use the banking app this could include some biometric information, which may be held by our trusted third parties, with your consent.

### How do we use your information in this way?

We use your information to check that it's you when you open an account. To do this, we collect and share your information with databases held by credit reference and fraud prevention agencies. This is so that we can verify your identity.

### Why do we use your information in this way?

It's all about keeping your money and personal details safe. We check your identity to:

- Make it harder for criminals to use false names and addresses, steal the identities of innocent people and access financial products and systems by pretending to be you.
- Help prevent fraud and stop money laundering.
- Uphold our legal obligations and complete necessary due diligence checks to make sure we know our customers.

You can find out more on why we check your identity and the types of documents we'll need to do this on our 'Proving your Identity' support page on [nationwide.co.uk/support/support-articles/manage-your-account/proving-your-identity](https://nationwide.co.uk/support/support-articles/manage-your-account/proving-your-identity).

We may also check your identity for our legitimate business interests. For example, to follow guidance and best practice set by our regulators. However, we'll always make sure that the way we process your information is not unfair to you.

In certain circumstances, you have the right to object to us processing your personal information.

You can find out more about this, and your other rights, in the '**What are your rights around your personal information?**' section.

# Helping to manage your accounts and relationship with us

We need to use your personal information to keep in touch with you, take care of your accounts, products and services, and look after your membership. We'll collect and use your details to:

- Process your application for a product or service with us, either directly with us or through an intermediary.
- Provide services based on your relationship with us e.g. issuing cards, administering payments on a current account or paying interest on a savings product.
- Provide members with access to additional, secure ways to pay or bank.
- Manage your membership with Nationwide and keep in touch with you.
- Send you communications to service your accounts, products and services.
- Manage any queries and complaints you might have.
- Make sure the data we hold about you is correct and up-to-date.

In managing your accounts and relationship with us, we may use information we already hold about you (e.g. your address and contact details). This is so we provide you with the best experience (e.g. by pre-populating sections on certain application forms, so you don't have to) and ensure that we hold consistent and correct information about you across our systems.

## How do we use your information in this way?

We'll process your information in this way when it's required as part of the terms and conditions agreed between us, and also when you ask us to carry out activities that need your authorisation (e.g. when you ask us to make a payment).

We may also need to use profiling (where we use your information to categorise groups of members and customers together based on their behaviours and interactions). This helps us make sure that we're being fair and consistent in the way we treat our members and customers.

We may need to use your information when it's necessary for our legitimate business interests. This will mainly be so that we can uphold our commitment as a responsible lender, follow guidance from our regulators and protect our member's financial security. We'll always ensure the way we process your information is safe and not unfair to you. More information is available about this in the table below.

You have the right to object to us using your information for legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

When do we process your information?	Why do we process your information?	Who might we share your information with?
When you apply for a product or service with us, either directly or through an intermediary.	<p>It's part of your agreement with us that you'll provide us with certain information before we can offer you a product.</p> <p>When applying for a credit product, decisions are often made through automated means. This is so that we can work out your eligibility and whether we're able to enter into an agreement with you. You'll find more information on this under the <b>'Automated decision making'</b> section.</p>	<p>Credit reference agencies, fraud prevention agencies.</p> <p>An insurer working with Nationwide (depending on the product).</p> <p>Referees, intermediaries and your employer (e.g. when confirming your income as part of a mortgage application).</p> <p>Other financial providers (e.g. when switching a current account or transferring an ISA).</p> <p>People or organisations acting on your behalf.</p>



<b>When do we process your information?</b>	<b>Why do we process your information?</b>	<b>Who might we share your information with?</b>
<p>When providing the services and benefits offered as part of your relationship with us. For example, when we're issuing cards, administering payments on a current account or paying interest on a savings product.</p>	<p>It's part of your agreement with us that we will provide you with these services.</p> <p>We use your information and profiling when providing your services to ensure:</p> <ul style="list-style-type: none"> <li>- You can maintain access to your products (e.g. replacing expired cards).</li> <li>- You continue to meet the eligibility requirements for the account or additional benefits provided.</li> <li>- You can manage your money and outgoings effectively.</li> <li>- Your product remains appropriate.</li> </ul> <p>This allows us to be fair and consistent in the way we treat our members, provide you with your information in a clear and concise way and ensure you receive the level of service you would expect.</p> <p>There may be activities you request that we complete in relation to your account (e.g. send a payment) where we require your authority to continue.</p>	<p>HMRC and other government agencies (e.g. DWP).</p> <p>Credit reference agencies, fraud prevention agencies.</p> <p>Suppliers acting on our behalf.</p> <p>People or organisations acting on your behalf.</p> <p>An insurer working with Nationwide (depending on the product).</p> <p>Payment processors (e.g. BACS) and card associations (e.g. Visa).</p> <p>Organisations providing data services to support us in managing our relationship with you and operating our business.</p> <p>Other banks and building societies, so that people or organisations making payments to your account can confirm that the name they have for you matches the name we hold for you in our records.</p>
<p>To manage and administer your membership with Nationwide.</p>	<p>This processing is applicable for those who are, or have been a member of Nationwide.</p> <p>If you are an eligible member of Nationwide, we are legally obliged to provide you with information in relation to your membership (e.g. the opportunity to vote at our AGM).</p> <p>Nationwide has legitimate interests where it is necessary to use your information to identify members and will use profiling to do so. This is because Nationwide is committed to being fair and consistent in the way we treat our members and to provide them with benefits and preferential rates and services.</p>	<p>Suppliers acting on our behalf.</p> <p>The Electoral Reform Service.</p>

When do we process your information?	Why do we process your information?	Who might we share your information with?
<p>To provide members with access to additional ways to pay or bank, that suit their needs (e.g. when registering and using our Mobile banking app).</p>	<p>It's part of your agreement when registering for the service that you'll provide certain information to us or we'll use information we already hold about you.</p> <p>Nationwide has a legitimate interest where it is necessary to collect certain information about the device used to access our online banking services, so we can create a device ID which is held with your customer profile. This is so we can have appropriate controls in place to protect your financial security as well as that of our other members and customers when using these services.</p> <p>Also, to make sure it is genuinely you using our Mobile banking app we may rely on biometric information. We will use behavioural biometrics to detect and prevent financial crime and may use face biometrics, held by our trusted third parties, if you have registered an image of your face and given your consent. More information is provided in the <b>Collecting 'special category' and sensitive personal information section</b>.</p> <p>Just so you know – Nationwide does not use the device ID created for any other purpose than protecting your financial security.</p> <p>Our supplier has the potential to collect additional information about your device (e.g. information about other apps you have), but they do not do so when you are using our Mobile banking app.</p>	<p>Suppliers acting on our behalf.</p> <p>PAYM if you have registered for this service.</p>
<p>To send you communications to service your account.</p>	<p>As part of your agreement with us, we need to send you certain communications, such as your statement and confirmation of interest rates.</p> <p>We also have legitimate interests to send certain service communications, where necessary. This is due to our obligations as a responsible lender, our regulators' guidance and best practice. We'll make sure the way we process your information is not unfair to you.</p>	<p>Suppliers acting on our behalf.</p>

When do we process your information?	Why do we process your information?	Who might we share your information with?
<p>To manage your queries and complaints.</p>	<p>We have legitimate interests to use your information where necessary to investigate and respond to any complaints you have raised with us.</p> <p>This is because we're committed to resolving any queries and complaints in a timely manner and will need to process your information to do so. We also have to comply with our regulatory obligations and guidance. We will make sure the way we process your information is not unfair to you.</p>	<p>Financial Ombudsman Service and regulators, such as the Information Commissioners Office (ICO).</p> <p>Third parties on your behalf (with your authority), such as your MP, solicitor, claims management company.</p> <p>Where your complaint relates to a Nationwide insurance policy, we'll share necessary information with the insurer to resolve your complaint.</p> <p>Intermediaries, where your complaint relates to services provided to you by a broker or intermediary.</p>
<p>To assess and accommodate our service to meet customer needs.</p>	<p>We have legitimate interests to collect and use your personal data to work with you through challenging times and ensure it is easy for everyone to use our products and services. We'll make sure the way we process your information is not unfair to you.</p> <p>This is because of our obligations as a responsible lender in line with regulators' guidance and best practice. We also have obligations to comply with the Equality Act 2010 and ensure our services are accessible to all.</p> <p>You may provide us with special category data, such as health information, so that we can understand your specific circumstances and provide you with the service and/or additional support that may be required.</p> <p>In most cases, we will ask for your consent when collecting this information. However, if you contact us by post or online we will assume you are happy for us to record the information unless you tell us not to.</p>	<p>When necessary, we'll provide information to our service providers to administer the request on our behalf.</p> <p>Where you have insurance products with third parties (e.g. the underwriters of our home insurance), we'll share this information with them to ensure that they provide you with the same level of service.</p> <p>Third parties on your behalf (with authority) such as a family member, the Citizens Advice Bureau and Macmillan Cancer Support.</p>

When do we process your information?	Why do we process your information?	Who might we share your information with?
To make sure the information we hold about you is accurate and of good quality.	<p>We have legitimate interests to analyse the quality and completeness of our data and the information we hold about you where necessary. We will use profiling as part of this activity.</p> <p>This is because data quality is vital to us. And we're required by law to provide reports to our regulators, ensure that data is in line with Business Validation rules and can be used to make strategic decisions. We'll make sure the way we process your information is not unfair to you.</p>	<p>Suppliers on our behalf.</p> <p>An insurer working with Nationwide (depending on the product).</p> <p>Aggregated level information will be disclosed to regulators.</p>

## Checking your credit reference and making sure products and services are affordable

Sometimes, we'll need to share your personal information with a credit reference agency to check that a product or service is right for you.

We do this to:

- Assess your creditworthiness, once you are over 18, and consider whether we believe you can afford to take out a product or service.
- Check the information you've provided to us is accurate.
- Prevent criminal activity and financial crime, including fraud and money laundering.
- Manage your ongoing relationship with us (e.g. managing your arranged overdraft limit, once you are over 18).
- Trace and recover debts.
- Make sure any offers we propose are appropriate (when we have the right to do so).

Four things you need to know about credit referencing:

1. When we ask a credit reference agency to do a search on our behalf, this may leave a search footprint on your credit file that may be seen by other lenders. This happens whether or not you, or Nationwide, choose to proceed with the application.
2. The number of searches carried out may have an impact on credit decisions made by us and other lenders.
3. If you're making a joint application, your credit records will be linked together. This creates what's known as a 'financial association' at credit reference agencies. So, you should always discuss and agree this with other applicants before disclosing their information to check that they're happy to proceed.
4. Information about any financial associations will be shared with other lenders if either of you make a credit application in the future – whether it's in just your name or together with someone else. Nationwide may receive and use information about your existing financial associations as part of our decision-making process.

## **Why do we share your information with credit reference agencies?**

We'll share your information with a credit reference agency when it's necessary in line with the terms and conditions agreed between us. This could be when you're applying for a product or as part of our ongoing relationship with you.

We also collect and use your information to help us improve our credit risk systems and policies to ensure we meet the needs of our customers. Discover more about this in the **'Enhancing your experience and our products and services'** section.

As a responsible lender, it's in our legitimate business interests to make sure the products we provide you are affordable and suitable for your circumstances. So, we share your information with credit reference agencies to check that we have sufficient data to make well-informed decisions about offering credit – decisions that don't put you at risk. It also helps to make sure other lenders have a clear picture of your credit history and how you manage your accounts, so they can assess the affordability of their products and services.

We believe it's in the interests of you, Nationwide and other lenders to allow fair decisions to be made when offering credit.

You have the right to object to us using your information for our legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

## **More about credit reference agencies**

There are three key credit reference agencies that we use. Take a look at their Credit Reference Agency Information Notices (CRAINs) to find out more about them, the data they hold (and for how long), the way they use and share your information, how they prevent fraud and your data protection rights. Their details can be found below.

TransUnion: [transunion.co.uk](https://www.transunion.co.uk)

Equifax: [equifax.co.uk/crain](https://www.equifax.co.uk/crain)

Experian: [experian.co.uk/crain](https://www.experian.co.uk/crain)

## **Preventing financial crime**

At Nationwide, our members' and customers' safety is our number one priority. And that's exactly why we collect and use your information to confirm that you are who you say you are, and to help stop financial crime including fraud and money laundering.

### **How do we use your information in this way?**

We share your personal information with fraud prevention agencies to help prevent financial crime. If required for fraud or criminal investigation reasons, we (and the fraud prevention agencies) may also allow law enforcement agencies to access and use your information.

### **What information do we share?**

The personal information we might need to share in this way includes:

- Your name
- Your address
- Your date of birth
- Your financial information
- Your employment details
- Identifying information (such as your IP address).

We'll share your information in this way when it's necessary as part of the terms and conditions agreed between us, either when you're applying for a product or as part of our ongoing relationship.

## **Why do we share your information in this way?**

We have a legitimate business interest to check people's identity, and identify and prevent financial crime including fraud and money laundering. Sharing your information in this way, when necessary, allows us to protect your financial security as well as that of our other members and customers. It also makes sure that we're complying with the law.

You have the right to object to us processing your information in line with our legitimate interests. You can find out more about this, and your other rights, in the '**What are your rights around your personal information?**' section.

## **A little bit about automated decisions**

Sometimes when processing people's personal information, we might use technology that makes automated decisions about our members and customers. This means that we may automatically decide that someone poses a financial crime risk if:

- The information processed reveals behaviour that indicates financial crime
- The information provided is different to information previously given.
- Someone appears to have deliberately hidden their true identity.

You have rights related to automated decision making. You can find out more about this, and your other rights, in the '**What are your rights around your personal information?**' section.

## **What happens if a financial crime risk is detected?**

We take financial crime seriously. And if we, or a fraud prevention agency, believe that someone poses a financial crime risk then we may refuse to provide the services that they've asked for. We can also stop providing services they already have with us.

If they apply for a job with us, and financial crime is detected, we may not employ them. Or, if they work for us already, we may stop their employment.

A record of any fraud risk will be kept by the fraud prevention agencies and this could mean that other providers refuse to offer services, finances or employment. Fraud prevention agencies can hold onto someone's personal data for different periods of time, depending on the situation. If someone is considered a fraud risk, their data can be held for up to six years.

Fraud prevention agencies may transfer your personal information outside of the UK, this may be to a country where the UK Government has decided that your information will be protected to UK standards. If it is any other country, fraud prevention agencies will ensure that appropriate safeguards are in place to continue to protect your personal information.

## **Any questions?**

If you have any questions about financial crime prevention, and how we use your information in this way, don't hesitate to get in touch.

# **Providing products and services from our partners**

Sometimes, we might need to collect and use your information to provide, introduce or distribute products and services from our partners (e.g. an investment product). This could also apply to benefits that come as part of your account (e.g. travel insurance).

## **How do we use your information in this way?**

We'll share necessary information with our partners when:

- You hold, or are applying for, an insurance policy or investment product underwritten and managed by one of our partners (e.g. our Home Insurance and Investment Funds).
- We need to let them know that you're a Nationwide member with a packaged account (e.g. FlexPlus) and you need to receive insurance cover (subject to eligibility).
- Discussing any claims, queries or complaints that may arise.

- To help them provide products and services to us
- We need to update them about a change to your address or contact details.

Our partners will also collect and use your information to manage the products and services that you have with them. As this then makes them the 'data controller', they'll provide more details on how they process your information at the time when it's collected by them or shared by Nationwide.

When selecting our partners, we take appropriate steps to make sure that they have adequate protection in place and that they follow data protection legislation.

### **Why do we need to use your information for this?**

We'll use your personal information to meet the promises we've made in the terms and conditions of your product or service. We also use your information to understand your needs so that we can accurately advise on the products and services that are right for you.

We may also use it for our legitimate business interests. For example, when we need to make sure that the terms you've agreed to will be upheld, or to follow best practice from regulators.

We'll always keep your best interests at heart and make sure that the way we process your information isn't unfair to you.

You have the right to object to us using your information for legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

We may also need to ask for 'special category data' (such as information about your health) from time to time, to check whether certain products and services are suitable. You'll find out more about this in the **'Collecting 'special category' and sensitive personal information'** section.

## **Helping in challenging times and with debt recovery**

We collect and use your personal information to:

- Assess the likelihood that your circumstances have changed.
- Work with you through challenging times, by understanding and supporting your needs.
- Recover any outstanding money owed to us (this could include trying to locate you).
- Help us decide on any further action we may need to take in order to recover money owed (e.g. whether we need to consider legal action or using a debt recovery agent).

### **How we use your information in this way?**

We'll process your information in this way when it's necessary to meet the promises we've made in the terms and conditions of your product or service, and also when you ask us to carry out activities that need your authorisation (e.g. when you've requested for someone to act on your behalf or if you choose to give us information about your health or any criminal convictions).

When necessary, we'll share your information with individuals and organisations that you've asked to act on your behalf (e.g. Citizens Advice and Step Change) as well as credit reference agencies, solicitors, tracing and debt collection agents, home visit agents and debt purchaser.

To carry out these activities, we may need to use profiling (where we use your information to categorise groups of members and customers together based on their behaviours and interactions). This helps us make sure that we're being fair and consistent in the way we treat our members and customers and also to support those who may be experiencing financial difficulty.

We may also use your information for our legitimate business interests. Rest assured, we'll always ensure the way we process your information is safe and not unfair to you. More information is available about this in the table below.

You have the right to object to us processing your information for our legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

<b>When do we process your information in this way?</b>	<b>Why we process your information in this way?</b>	<b>Who might we share it with?</b>
<p>To assess the likelihood that your circumstances have changed.</p>	<p>As part of our legitimate business interests, we might need to use your information and profiling to identify members who might be experiencing financial difficulty. We'll do this using information we have on our own records and information collected from credit reference agencies.</p> <p>We do this so that we can lend responsibly and follow best practice guidance from our regulators. We'll always make sure that the way we process your information isn't unfair to you.</p>	<p>People acting on your behalf.</p> <p>Credit reference agencies as part of managing your ongoing relationship with us.</p> <p>Suppliers acting on our behalf.</p>



When do we process your information in this way?	Why we process your information in this way?	Who might we share it with?
<p>To work with you through challenging times, understanding and supporting your needs.</p> <p>To recover any outstanding money owed to us (this could include trying to locate you).</p> <p>To help us decide on any further action we may need to take in order to recover money owed (e.g. whether we need to consider legal action or using a debt recovery agent).</p>	<p>As part of your agreement with us, we have the ability to recover any outstanding debts (e.g. if you miss a payment or exceed your arranged overdraft limit).</p> <p>We have a legitimate business interest to use your information to provide a tailored and personal approach to accommodate your needs and specific circumstances, when necessary.</p> <p>We may also need to use your information to uphold our contractual rights to recover our debt, be a responsible lender and follow our regulators' guidance and best practice. We'll make sure the way we process your information isn't unfair to you.</p> <p>In carrying out these activities, you may provide us with special category data, such as health or criminal information, so we can provide you with the service and/or additional support that may be required.</p> <p>In most cases, we'll ask for your consent when collecting this information. However, if you contact us by post or online we will assume you are happy for us to record the information – unless you tell us not to.</p> <p>When we ask for 'special category data', you have the right to withdraw your consent. You can find out more about this, and your other rights, in the <b>'What are your rights around your personal information?'</b> section.</p> <p>This won't affect any use we have made of the information before you withdrew your consent.</p>	<p>Credit reference agencies:</p> <ul style="list-style-type: none"> <li>- If you miss a payment or exceed your arranged overdraft.</li> <li>- If we have agreed a repayment plan or debt management plan with you.</li> <li>- When we are trying to locate you.</li> </ul> <p>Debt recovery and tracing agents that we've instructed. They may contact credit reference agencies.</p> <p>Suppliers acting on our behalf</p> <p>People acting on your behalf – including individuals or organisations such as Citizens' Advice Bureau or Step Change.</p> <p>Government bodies and agencies where we are required or permitted to do so – including local government, Dept. of Work &amp; Pensions.</p> <p>The Land Registry, in the event that we choose to put a charge on a property.</p> <p>Other lenders and financial services providers who have an interest in a property.</p> <p>Solicitors acting on our behalf and courts in the event that we enter into litigation.</p> <p>The Insolvency Service if we're notified you are declared bankrupt or have entered into a IVA.</p>

## Information about defaults

We'll always look to work with you if you get into financial difficulty, so please do get in touch with us first if you're struggling to make repayments.

If we fail to reach an agreement to repay the debt, we'll issue a notice that gives you 28 days to bring your payments up to date. If you don't bring your payment up to date by then, we'll record a default with credit reference agencies and this will remain on their records for up to 6 years.

## Sharing relevant marketing about products and services

### How do we use your information in this way?

We want you to get the most out of your relationship with Nationwide. One of the ways we might help you do this is by using the contact details you've supplied us to send you marketing information about products or services we think you'll find interesting. For example, it might be a monthly e-newsletter keeping you updated on what's happening with your Building Society. Or it could be info about a new type of savings account designed to help your nest-egg grow quicker.

We also collect and use your information to help us plan and tailor the delivery of our marketing campaigns. Discover more about this in the **'Enhancing your experience and our products and services'** section.

### Your marketing preferences, your choice

When it comes to receiving marketing, you're in control. And you're free to choose if you want to hear from us at all and how – whether that's by post, phone, email or through messages on our Internet Bank or banking app. It's also totally fine if you change your mind. As a member, you can update your marketing preferences at any time:

- On the Preference Centre on the Internet Bank.
- On the banking app under My Details & Settings.
- By calling us on 03457 30 20 11.
- In your local branch.
- By writing to us at FREEPOST SCE 7125, Swindon, SN38 9LY.

### Our marketing on websites and social media

We want you to get the most out of your relationship with Nationwide. So we use social media and websites to let you know about the products and services we offer that might be of interest to you.

One of the ways we do this is by matching the personal details we hold about you, such as your email address, with the details social media companies or website publishers hold about you. This is done in a controlled way so your identity is never revealed.

By doing this, social media and websites can share tailored marketing messages with you about our products and services. We have strict processes in place to keep your personal information safe and we won't use it in a way that's unfair to you. We do this by:

- Never sharing any other personal information about you with social media companies or website publishers.
- Making sure your information doesn't give your identity away by using hashed data in a secure and controlled environment.
- Using carefully selected social media companies and website publishers, such as Reach PLC. We take steps to make sure your information will not be used for any reason other than showing you marketing messages from us that we think you'll be interested in.
- Never agreeing to your information being sold to third parties.
- Making sure that your information is securely deleted.

You have the right to object to us using your information for legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section. Just so you know, if you do submit a 'right to object request' we will stop sending you marketing messages tailored to you. However, you might still see some general marketing messages from us, but these won't be targeted to you.

If you want to control the adverts you see on social media platforms and websites, you can often manage your marketing preferences through their settings page. In some cases, you can opt out of receiving targeted marketing messages. You'll still see adverts, but these won't be tailored to you.

### **Managing your marketing preferences if you are a commercial customer**

We want you and your business to get the most out of your relationship with Nationwide – no matter what type of commercial account you have with us. So if we have your name down as a contact or associated party (e.g. an authorised signatory), we may send you marketing information from time to time about products or services we think could be of interest – or that could help you grow your business.

We have a legitimate business interest to use your information in this way due to the relationship you have with us as someone associated with one of our commercial products. We will only use this information in a way which is fair to you and you can update your marketing preferences at any time by writing to us at FREEPOST SCE 7125, Swindon SN38 9LY.

Important note: If you have a personal account too (e.g. a personal savings account), just bear in mind that you'll need to check and update these marketing preferences separately. You can do this any time in the Internet Bank (under My Details), on the banking app (in Details & Settings), or by going in to your local branch.

And don't worry, even if you'd rather not get marketing messages, we'll still make sure you always receive important information about your accounts (for example, when your online statements are available).

We'll never pass on your details to anyone else for their marketing purposes either.

## **Meeting our legal and regulatory obligations**

At Nationwide, we're required to collect and use your personal information in a number of circumstances to meet our legal and regulatory obligations.

These include using your personal information to carry out a range of activities that ensure we comply with the requirements set out by our regulators (e.g. Financial Conduct Authority – FCA – and Prudential Regulation Authority – PRA) and in relevant legislation (e.g. Data Protection Legislation & Anti-Money Laundering Regulations). We also disclose information to HMRC and other government bodies when we are required or permitted to do so.

### **How do we use your information in this way?**

Sometimes, we're required by law to produce reports or statistical modelling that we disclose to regulators or government bodies (e.g. when we need to report our complaints statistics to the FCA or liquidity modelling for Banking Authorities). To produce these reports, we may need to use profiling (where we categorise your behaviours, interactions and/or characteristics alongside other members and customers). This helps us make sure that our reporting is accurate.

In certain circumstances, we'll process your personal information in this way for our legitimate business interests. This is when we have legal obligations to process your information but flexibility in how we do this. For example: when data protection legislations govern that we need security controls in place to make sure your information is not disclosed to the wrong person. To comply with this obligation, we have stringent identification and verification processes in place when you open a product, together with numerous security controls (e.g. our authentication process to identify you when you use our products and services).

You have the right to object to us using your information for legitimate interests. Find out more about this in the **'What are your rights around your personal information?'** section.

## Enhancing your experience and our products and services

We're constantly looking to improve how we do things – and understanding more about you helps us do exactly that.

We collect and use your personal information to help us make our business better, improve products and services and enhance how we engage with members and customers. This includes:

- Enhancing your experience in branch, online and on the phone so we can provide the best possible service now and in the future.
- Understanding your needs and looking at how you engage with Nationwide.
- Creating and improving the products and services we offer.
- Develop and improve our processes, credit risk systems and policies so we can meet the needs of our members and customers.
- Understanding our members' diverse backgrounds to help inform our strategy.
- Planning and tailoring how we communicate and provide relevant content to you.
- Developing our business and understanding how we're performing as a Building Society.

### How do we use for your information for this?

We look at you and how you engage with us (e.g. how long you've been a member or whether you open our emails), your transactions and how you use our products and services (e.g. the types of accounts you have and how you use our Internet Bank and banking app). Sometimes, we'll collect information about you from organisations carrying out market research on our behalf to make sure you had a positive experience in our branch network or call centre, or to ask your opinion on our products and services, or trends in our industry.

Then, we structure and analyse this information to consider how you might use our products and services in the future. We may also use your information to categorise groups of members who interact and engage with us in similar ways. We'll also use information we have collected from credit reference agencies and other organisations to profile your information (e.g. where we categorise behaviours, interactions and/or characteristics, both now and in the future). We'll do this whether or not you, or Nationwide, choose to proceed with the application. This will be as part of our statistical modelling and as part of Nationwide reviewing its risk appetite when making lending decisions.

### Why do we use your information in this way?

We might use your information in this way when it is in our legitimate business interests. Your information and views help us understand the ever-changing needs of our members and customers, putting you at the heart of decisions we make about our products and services. By doing this, we can keep evolving what we offer and growing as a society.

Profiling your information alongside other members and customers also helps us to ensure that we're providing a consistent service and giving people the best products and advice at the right times. More information is available about this in the table below.

We'll always make sure the way we process your information is safe and not unfair to you. Where possible, we'll keep your details anonymous and use your information only to produce statistical reports.

You have the right to object to us processing your information for our legitimate interests. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

What type of information do we put in?	What do we do when profiling your information?	How does this benefit Nationwide and you?
<ul style="list-style-type: none"> <li>• Personal information to identify you</li> <li>• Details about the products you hold and account activities (e.g. your transactions)</li> <li>• Information about your work or profession, your nationality, education and social and economic demographic</li> <li>• Information you put into our online services (e.g. our mortgage calculators)</li> <li>• Information about how you interact with us (e.g. when you visit our branch or call us)</li> <li>• Information about our online content which you have viewed</li> <li>• Details of feedback you have provided, either directly to us or you make public e.g. on social media</li> <li>• Information about the services you use (e.g. the internet bank) and how you use them</li> <li>• Details of the devices you use to interact with us</li> <li>• Information about how you respond to our communications (e.g. whether you read an email)</li> <li>• Information on your location, gathered from your mobile phone or other device, where you access the internet or where you make a payment</li> <li>• Information we have gathered from third parties.</li> </ul>	<ul style="list-style-type: none"> <li>• Make predictions about you and your behaviours to understand the likelihood that you may do something e.g. be interested in our mobile app</li> <li>• Segment members (e.g. grouping you with people with similar traits) to make sure you receive the correct service message for the product you hold and your personal circumstances (e.g. time left on mortgage)</li> <li>• Analyse your interactions with Nationwide e.g. when you visit a branch; telephone our call centre or visit our website</li> <li>• Assess the performance of communications we provide you with e.g. if we send you information about a savings account with a better rate of interest, do you go on to open a new account</li> <li>• Monitor the performance of our products and services in the market place</li> <li>• Produce anonymised reports for internal use and to meet our legal and regulatory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Helps us to grow and offer the right member benefits</li> <li>• Ensures we are fair and consistent and offer the best outcome for our members</li> <li>• Ensures our communications are appropriate</li> <li>• Allows us to develop new products which meet the needs of our members and customers</li> <li>• Allows us to continuously improve our content and the way we interact with you</li> <li>• Helps us improve our productivity (e.g. reduce our call waiting times)</li> <li>• Helps us develop new services based on emerging trends</li> <li>• Helps Nationwide have a 'big picture' view of our members and our business so we can identify improvements to our products and services</li> <li>• Allows us to offer a personalised service</li> <li>• Helps us make investment decisions so that we can provide the services our customers and members require.</li> </ul>

# Testing and improving products, services and systems

We're constantly looking to improve our products, services and systems. And, when it's essential, we may use your personal information for testing so that we can make them even better.

## How do we use your information in this way?

We have stringent processes in place to keep your personal information safe and we won't use it in a way that's unfair to you. When we use your information for testing, we:

- Always do this in a secure and controlled environment.
- Only use the minimum amount of data necessary for the testing.
- Only use carefully selected specialist service providers, where necessary.
- Only hold your information in this way for as long as needed to carry out testing.

## Why do we use your information in this way?

Using your information for testing is necessary for our legitimate business interests as it allows us to maintain and improve the security, integrity and performance of our systems. Also, being able to develop systems with members in mind enhances the experiences you have with Nationwide.

You have the right to object to us processing your information in this way. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

# Who might we need to share your information with?

Your information will be shared:

- Within the Nationwide Group, for the purposes explained in the **'How does Nationwide use your information?'** section.
- With partners and suppliers that support the operation of the business.
- With specific third parties that you've authorised us to deal with (e.g. professional advisors, family members or representatives for you).
- With third parties, when we're required to do so under the terms of any of our secured wholesale funding programmes.

When necessary, we may also share information with other organisations including:

- Credit reference agencies
- HM Revenue & Customs and other tax authorities
- UK Financial Services Compensation Scheme
- Regulators e.g. FCA
- Financial Ombudsman Scheme
- Law enforcement agencies
- Fraud prevention agencies
- Government bodies and agencies
- Insurers and reinsurers (if you apply for insurance through Nationwide or make a claim)
- Other lenders who also have a charge on the property (if you have a mortgage with us)
- Other lenders and financial services' providers
- Companies and organisations that introduce you to us
- Financial advisers
- Land agents
- Card associations (e.g. Visa)
- The Direct Debit scheme
- Payment processors (e.g. BACS)
- Retailers
- Comparison websites
- Market research providers.
- The Electoral Reform Service (to help us run our AGM)
- Organisations providing data services to support us in managing our relationship with you and operating our business.

You'll find out more about when we'd need to share your information with partners in the **'Providing products and services from our partners'** section.

If you've authorised us to, or in exceptional circumstances when we believe it's in your interests, we might also share your information with healthcare or other wellbeing organisations. But we'll only share the minimum amount of information needed (for example, your contact details).

Also, in the event that we transfer, sell or merge parts of our business, your information will be shared accordingly.

## **Sending your information outside the UK**

We may transfer personal information to countries outside the UK when:

- You request for us to do so.
- We're required or permitted to by law.
- We're sharing data with a third party to support us in managing your account and running Nationwide.

When working with our suppliers and/or transferring information to countries outside the UK, we take appropriate steps to ensure that there is adequate protection in place and that data protection legislation is followed.

This could be by:

- Ensuring that we transfer information to countries that we believe have comparable data protection legislation to the UK.
- Putting suitable clauses in our contracts so that organisations take appropriate steps to comply with UK data protection law.

If you would like more information on this, don't hesitate to get in touch.

## **How long do we keep your information?**

Our aim is to keep your information for as long as we need to, in order to manage your relationship with us and comply with legal and regulatory requirements.

We'll aim to keep your personal information for:

- As long as you're a member or customer with Nationwide.
- Up to 12 years after your business relationship or last account, product or service has closed or ceased.

We may keep your information longer than indicated if we cannot delete it for legal, regulatory, or technical reasons. We may also keep it for research or statistical purposes. If we do, we'll make sure that your privacy is protected and only use it for those purposes. More information is available about this in the table below.

Some information may not be kept for the lifecycle of your account e.g. call recording.

### **Keeping your information safe**

We're committed to taking good care of your personal information safe and we have stringent security measures in place to keep it well-protected.

<b>Your relationship with Nationwide</b>	<b>How long we hold your information for</b>
You are interested in taking out a product with us.	We'll keep the information we have collected between 18 months and 6 years, depending on the stage in the application process you are at (e.g. whether you chose not to open your account with Nationwide but we have completed a credit check against you).

Your relationship with Nationwide	How long we hold your information for
You are a customer or member.	<p>We'll keep the information we hold about you as long as you are a customer or member.</p> <p>There may be times when we don't need certain pieces of information about you while you're a member, such as data we collect and use about you when developing our products and services.</p>
You used to have an account with us but it's closed now.	<p>For most products and services, your information will be retained for 6 years following the closure of your accounts.</p> <p>If you have had a mortgage with Nationwide, your information may be retained for up to 12 years after the closure of your accounts. This is so Nationwide can comply with its regulatory obligations.</p>

**Just so you know:** Sometimes, due to legal and regulatory obligations, or for technical reasons, we'll need to keep your personal information for longer periods of time. For instance, when completing modelling and statistical analysis for our mandatory reporting requirements.

## What are your rights around your personal information?

You have certain rights when it comes to your personal information and there are a number of requests you can make. When you submit a request, we'll review it and get back to you as soon as possible – always within a month.

Your rights are explained below:

### 1. The right to access your information

You can ask us for a copy of any information we hold on you. This is called a Data Subject Access Request (DSAR).

To make a Data Subject Access Request, just fill in an access request form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll review your request and get back to you within one month. When we provide you with a copy of your personal information, we'll also provide an explanation of how it's being used. If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

### 2. The right to rectify your information

You have the right to ask us to correct information that you feel is inaccurate or incomplete, or both.

You can ask us to correct your information by filling in a rectify request form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll review your request and get back to you within one month.

If we've shared your information with other organisations, then we'll do our best to let them know that you have asked for the information to be rectified.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

### 3. The right to restrict how we use your information

In certain circumstances, you have the right to restrict us from processing your information any further or deleting it.

To do this, you can fill in a restrict request form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll review your request and get back to you within one month.



Just so you know: there are some things that we need to use your information for. For example, to take care of your accounts, products or services, to help protect you from fraud and to fulfil legal and contractual obligations. And, if processing is restricted, we'll continue to store your information and process it as required by law.

If we have shared your information with other organisations, then we'll do our best to let them know that you have asked for the information to be restricted.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

#### **4. The right to object to how we use your information**

In certain circumstances, you have the right to object to the way we process your information. For example, when we're processing your information for direct marketing or if you feel that us processing your information for legitimate interests is causing you such a level of damage or distress that you would like us to stop.

You can object to us processing your information by filling in an object request form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll get back to you within one month.

Just so you know: there are some situations where we won't stop processing your information despite your objection. We'll review your request and let you know our reasons for agreeing or not agreeing.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

#### **5. The right to erase your information**

In certain circumstances, you have the right to have your information erased. Please note that we may not be able to agree to your request if we cannot delete your information for legal, regulatory or technical reasons

You can ask us to erase your information by writing to:

Information Rights  
Nationwide Building Society  
Kings Park Road  
Moulton Park  
Northampton NN3 6NW

We'll get back to you within one month.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

If we've shared your information with other organisations, then we'll do our best to let them know that you've asked for the information to be erased.

#### **6. The right to transfer your information**

In certain circumstances, you have the right to ask us to transfer a copy of some of your information to you or to a new data controller (e.g. another financial provider or comparison website). This applies when you've shared your information with us or it's been collected with your consent or where collecting your information was necessary for the agreement between us.

You can do this by filling in a portability request form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll review your request and get back to you within one month.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

## 7. The right to human intervention

In certain circumstances, you have the right to ask for an automated decision to be reviewed. To do this, you'll need to fill in a human intervention form available on our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy). We'll review your request and get back to you within one month.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

## 8. The right to complain to the regulator

We're always here to help and you can contact us 24/7 with any queries you have. If things don't go as you expected, you can make a complaint by calling us, sending a message, writing to us or popping into branch.

If you still have unresolved concerns, you also have the right to complain to data protection authorities. The authority overseeing data protection in the UK is the Information Commissioner's Office. Their contact details are below:

Information Commissioner Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Telephone: 0303 123 1113

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

## 9. To withdraw your consent

Where we are relying on your consent to process any of your information, you have a right to withdraw that consent at any time. This will not affect any use we have made of the information before you withdrew your consent.

If you're a member and have consented to marketing, you can change your marketing preferences at any time on the Internet Bank, banking app, by post, phone or by popping into branch. Find out more about this in the **'Sharing relevant marketing about products and services'** section.

If you'd like to find out more about this, and your other rights, just head over to our information rights page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy), pop into a branch or call us.

## Collecting 'special category' and sensitive personal information

From time to time, we may need to ask for personal details that might seem sensitive. For example, a question about your health or whether you have any previous criminal convictions. This is known as 'special category data' and covers information about your health, racial or ethnic origin, politic opinions, religious or philosophical beliefs, trade union membership, sexual orientation or biometric or genetic data.

We'll only ask for this information when we absolutely need to, and we use it to:

- Understand and accommodate any additional needs you might have. For example, if you could benefit from the services of our Specialist Support team to help with any issues around your health, memory, caring responsibilities or any challenges you're facing in life.
- Understand any details about your health that we need to know for the purpose of insurance policies or investment products.
- Provide you with products or services that you might wish to use biometric information for (e.g. your fingerprint for gaining access to our banking app).

- Carry out any searches, as part of regulatory obligations that require us to identify if someone has or might have a criminal conviction.
- Detect and prevent financial crime. For example, when collecting special category data known as “behavioural biometrics”.

More information is available about this in the table below.

**How do we collect your information in this way?**

In almost all cases, we'll ask for your consent when collecting special category data. However, if you write to us or send a secure message (when signed into the Internet Bank) containing this type of information, then we'll assume that you're happy for us to record it – unless you tell us not to. If someone acting on your behalf provides this information, we'll record what's been provided and who gave it to us.

You have the right to withdraw your consent to us recording special category data at any time. You can find out more about this, and your other rights, in the **‘What are your rights around your personal information?’** section. This will not affect any use we have made of the information before you withdrew your consent.

Also, we collect and use behavioural biometrics for fraud prevention purposes. We don't ask for your consent when doing this, because it is in yours, Nationwide and other banks and building societies' interests to use new technologies to support us in protecting everyone's economic wellbeing and stop financial crime. This data is not directly linked with your name or contact details, and will never be used for any other purposes.

What special category data might we ask for?	Why do we process this special category data?	Who might we disclose this special category data to?
Details about your health and disability.	<p>So that we can understand your specific circumstances and provide you with the service and/or additional support that's needed.</p> <p>In some cases, the information may be used to make decisions as to how we contact you as part of your relationship with us. For example, you might ask us to send statements in braille.</p> <p>In most cases, we will ask for your consent when collecting this information. However, if you contact us by post or online we will assume you are happy for us to record the information – unless you tell us not to.</p>	<p>We will only disclose this special category data when we have your authority to do so.</p> <p>If you've requested our braille or Type Talk services, we'll share your information with the suppliers who provide these to fulfil your request.</p>
Details about your health, required for insurance policies or investment products.	<p>To understand your needs and determine whether you are eligible for the policy.</p> <p>In most cases, we'll ask for your consent when collecting this information. However, if this information is provided by someone acting on your behalf, we will record what information has been provided and who gave it to us.</p>	<p>With your permission, we may share this information with insurance partners, particularly where we are completing the application on your behalf.</p>

<b>What special category data might we ask for?</b>	<b>Why do we process this special category data?</b>	<b>Who might we disclose this special category data to?</b>
<p>Biometric information, which may be held by our trusted third parties (e.g. your fingerprint or face biometrics), when used to manage your products and services.</p>	<p>We use advanced technology and processes (such as biometric information) to help protect your information and also confirm your identity.</p> <p>These include fingerprint, voice and image technology, which create a map of your fingerprint, an image of your face or a sample of your voice.</p> <p>This data is then intelligently analysed to confirm a match when you use your fingertip, facial image or voice recording to access products and services (e.g. the banking app).</p> <p>We'll always ask for your consent when we collect this kind of data.</p>	<p>You may choose to use biometric information stored on your personal devices to access our products and services (e.g. when you access the banking app using Touch ID). But, we don't collect this information from your device.</p> <p>If you provide us with biometric information directly, we may share it with suppliers acting on our behalf.</p>
<p>Behavioural biometrics data relating to the physical, physiological, or behavioural characteristics of a person. (e.g. individual's interaction with their computer or smartphone device, including the use of their keyboard, mouse and/or the way in which they hold and interact with their device).</p>	<p>We use this information to detect and prevent fraud, unlawful acts and money laundering as it is in the public interest to do so.</p>	<p>The data is collected and processed by one of our third-party suppliers, however it will never be shared or disclosed to any other organisations.</p>
<p>Searches made, as part of our regulatory obligations, which identify that someone has or may have a criminal conviction.</p>	<p>We run searches with fraud prevention and credit reference agencies, in certain circumstances, and these may provide information about someone's criminal convictions.</p> <p>We use this information to detect and prevent fraud, unlawful acts and money laundering as it is in the public interest to do so.</p>	<p>Information is shared with fraud prevention, credit reference and, if necessary, law enforcement agencies.</p> <p>This information may also be shared with our insurance partners if you have a policy or product with them.</p>

What special category data might we ask for?	Why do we process this special category data?	Who might we disclose this special category data to?
Information obtained during your relationship with us e.g. payments to a trade union or political party.	<p>We use details of payments made to/ from your account so that we can make the payment you have requested, and/ or make sure you receive any payments made to you. This may include details of a payment you have made to a trade union or political party.</p> <p>We may also become aware that you have a criminal conviction e.g. if your address is updated to that of a prison.</p>	<p>Information is shared with third parties to process payments.</p> <p>Information about criminal convictions may be shared with our insurance products if you have a policy or product with them.</p>

## Automated decision making

### What information do we use to make these decisions?

At Nationwide, we sometimes use advanced technology to make automated decisions about our members and/or customers. This could be when you're applying to open a product, service or account with us, or as part of our ongoing relationship.

### When do we use automated decision making?

1. To assess your application and check if we can approve you for credit, to make sure that we're lending responsibly.
2. To assess if we can offer you a financial product and work out the level of interest that you'll pay. This helps us make sure that we're fair and consistent in our product offerings.
3. To check if someone's making a fraudulent application or if there's activity on your account that needs further review. This is so we can protect your money and protect you from financial crime.
4. To decide if you are, or continue to be, eligible for the product or service you've chosen. For example, seeing if you're eligible for a preferential interest rate on a savings product.

### What information do we use to make these decisions?

For automated decision making, we use information that we've collected or hold about you from your applications. Sometimes, we might also use information from other sources such as credit reference or fraud prevention agencies – but we check this against the information you give us. Find out more about this in the **'Where does Nationwide collect information from?'** section.

### Profiling

Profiling is used to make automated decisions. This is where we combine your information with information about others so that we can:

- Understand trends in traits and behaviours.
- Make predictions about how you might use our products and services in the future.
- Analyse data to improve our service and generate alerts (e.g. where we suspect that you may be the victim of financial crime).

## Why we use your information in this way?

We use automated decision making to check that we can enter into an agreement with you, and also carry out our legal and regulatory obligations. Sometimes, it's required by law (e.g. when complying with UK money laundering regulations).

In certain circumstances, you have the right to ask for a decision to be reviewed by a person. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.

## Want to know about why we use your information for automated decision making?

You can find out more about automated decision making, and why and how we do this in the table below.

What information we put in	How we use this information	Why we do this and how it benefits you and Nationwide
<ul style="list-style-type: none"><li>Information you provide us as part of your credit application (e.g. your income)</li><li>Information we already know about you (e.g. other products you hold with us)</li><li>Information about your transactions and how you use our services</li><li>Information about the devices you use</li><li>Information about you held with credit reference and fraud prevention agencies</li><li>Existing data we hold for modelling purposes</li><li>Information gathered from third parties.</li></ul>	<ul style="list-style-type: none"><li>To validate the information you have provided us</li><li>To make sure our credit scoring system is fair</li><li>To create profiles about you through analysing the information</li><li>To better understand trends in traits and behaviours</li><li>To make predictions on potential fraudulent behaviour</li><li>To analyse the data to improve our services.</li></ul>	<ul style="list-style-type: none"><li>To comply with our requirements as a responsible lender</li><li>To prevent fraud and money laundering by keeping your money and identity safe</li><li>To make sure we are fair and consistent in how we treat our customers and members</li><li>To make our processes efficient</li><li>To allow us to offer benefits where we can to our members e.g. identify that you be eligible for a loyalty product</li><li>To manage our risk appropriately</li><li>To trigger alerts when there is unusual activity on your account.</li></ul>

## Using your information when you're not a Nationwide customer

From time to time, we might need to collect or use personal information from individuals who aren't customers or members of Nationwide. This could be when they:

- Have a Power of Attorney or a third-party mandate to act on a member's behalf.
- Are the Personal Representative registering the death of a member or customer.
- Are acting as the guarantor on a member's mortgage.
- Are acting as the donor for the deposit on a member's mortgage.
- Are an additional cardholder on a Nationwide credit card.
- Are a beneficiary of an account held in trust.
- Are a parent or guardian accompanying a child opening an account in their own name.
- Are supporting a member when English isn't their first language.
- Are raising a complaint but aren't a member or customer of Nationwide.

- Are acting on behalf of our member, either in a professional capacity (e.g. a broker in a mortgage application) or a personal capacity (e.g. a family member).
- Are a child with an account opened on their behalf by an adult.
- Are paid money by a Nationwide member. We collect information so our member can confirm that the name they have, matches the name on the account they wish to pay.

### **How do we collect or use this information?**

In most cases, we'll collect this information from the individuals directly. But there might be times when our members or customers provide their details (e.g. when our member is setting up a payment to the individual). If you're providing information about another individual, we'll assume that you have told them that you are sharing their details and where they can find more information on how we may process their details.

### **Why do we need this information?**

We might need to use this information to confirm their identity, help manage others' accounts, prevent fraud and engage with members and customers.

We'll only use this information if we have a legal reason or legitimate business interests to do so.

These individuals also have certain rights regarding their personal information. You can find out more about this in the **'What are your rights around your personal information?'** section.

## **Updating your personal information**

### **Why it's important to keep your personal details up to date**

We need you to keep your personal details up-to-date so that we can get in touch with you about the account, product or service you have with us.

If you change your name, address, phone number or email address, please let us know straight away. You can update your contact details at any time in the Internet Bank, by following the instructions on our dedicated support page on [nationwide.co.uk/support/support-articles/how-to/update-details/change-your-address-or-phone-number](https://nationwide.co.uk/support/support-articles/how-to/update-details/change-your-address-or-phone-number). Alternatively, you can call us on or pop in to your local branch.

### **Managing different addresses**

We know that sometimes you might need to have certain accounts registered to different addresses.

To accommodate this, we're able to hold:

- Account level postal addresses. These addresses are typically used for individual account statements and communications to do with these accounts.
- One customer level postal address. This is your primary postal address and is typically, used to contact you about general communications that are not specific to a particular account. For example, marketing information and mail about your AGM voting or your Annual Savings Statement.

Important note: If you let us know about a change of postal address, we will update all of your addresses unless:

- You tell us otherwise.
- You've been asked to notify us which account(s) you want to change your address on, as part of our change of address process.

If you have recently taken out a mortgage with us, please make sure we have the most up-to-date postal address for any other accounts you hold with us.

If you're unsure about the address we have on record for you, get in touch.

## **Your email addresses and phone numbers**

We only hold one email address, one home number and one mobile number per customer and these apply to all accounts and policies you have with us.

If you change your email address or phone number at any time, the new contact details you provide will replace all existing ones. This includes when you open a new account or product with us.

## **Managing contact details with our partners**

If you've opened an account or a policy with one of our partners but through us (e.g. an investment or insurance product), and you notify us about a change to your contact details, we'd recommend getting in touch with them directly to confirm any changes. Likewise, if you have advised our insurance partners of a change to your contact details please get in touch with Nationwide to confirm any changes.

## **Contacting the Data Protection Officer**

Nationwide's Data Protection Officer (DPO) is responsible for protecting personal information held by Nationwide Building Society and its subsidiaries. You can contact them at the address below:

The Data Protection Officer  
Nationwide Building Society  
Nationwide House  
Pipers Way  
Swindon SN38 1NW

## **When we use CCTV**

For the safety of our customers and team members, we use CCTV (comprising static cameras and body-worn video (BWV)) throughout our branch network data centres, admin centres and hubs. Where used, BWV will capture audio as well as video imagery.

## **How do we use your personal information in this way?**

When we collect your information using CCTV, we:

- Only use carefully selected specialist service providers, where necessary.
- Will only hold your information in this way for as long as is needed.
- Will only share it in very limited circumstances, such as when we're permitted or required to comply with a legal or statutory requirement e.g. from the Police or Department of Work and Pensions.

We have stringent processes in place to keep your personal information safe, and we'll never use it in a way that's unfair to you.

## **Why do we use your information for this?**

Using CCTV in our branches, data centres, admin centres and hubs is necessary for our legitimate business interests. It helps us provide a safe and secure environment for people who visit us or carry out business in our premises. It also supports us in detecting and deterring any criminal activity.

You have the right to object to us processing your information in this way. You can find out more about this, and your other rights, in the **'What are your rights around your personal information?'** section.



## Cookies

To find out more about how we use cookies on our websites and digital services, please see our cookies page on [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy)

## Updating this notice

Just so you know: we'll update this notice from time to time. If we make changes, we'll try to let you know but it's always a good idea to revisit [nationwide.co.uk/privacy](https://nationwide.co.uk/privacy) when you can.

This notice was last updated on 1 October 2024.

Ask in branch  
Call **03457 30 20 11**  
Visit **nationwide.co.uk**

**Nationwide Building Society** is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority under registration no 106078.  
You can confirm our registration on the FCA's website **fca.org.uk**

**Nationwide Building Society**. Head Office: Nationwide House, Pipers Way, Swindon, Wiltshire SN38 1NW

You can receive this document and others like it, in Braille, large print or on audio CD. Just call **03457 30 20 11** or visit your local branch if you'd like us to arrange this for you.

If you have hearing or speech difficulties:

- You can use Text Relay if you have a textphone. Dial **18001**, followed by the phone number you want to ring
- SignVideo is also available if you're deaf and use British Sign Language. Just visit **Signvideo.co.uk**

To find out about other ways we may be able to help, search 'accessibility tools' on **nationwide.co.uk**

**Nationwide cares about the environment** - this literature is printed in the UK with biodegradable vegetable inks on paper from FSC® certified and other controlled material.

