

## **Banking Standards Board**

### **Privacy Notice**

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#### **Introduction**

1. The Banking Standards Board (BSB) is committed to protecting and respecting your privacy. This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, is handled by us. The BSB (company number 09278255) is an independent organisation established to promote high standards of competence and behaviour across UK banks and building societies.
2. For the purposes of data protection legislation, we are a data controller and our address is St Magnus House, 3 Lower Thames Street, London EC3R 6HD. Our registration number with the Information Commissioner is ZA348515.

#### **Information we collect about you**

##### **Information you give us**

3. You may give us information about yourself in a number of ways. These include:
  - using, visiting or interacting with our website (such as filling out forms or registering on our website);
  - attending the BSB's working groups, forums or roundtable discussions;
  - responding to consultations;
  - corresponding with us by phone, e-mail or post;
  - sending information directly to us; or
  - if you are an employee of a BSB member, providing us information when we interview you as part of our Assessment exercise.
4. The information you give us may include the following information about yourself:
  - full name;
  - job title and employer; and
  - contact details.

##### **Technical information we collect about you when you visit our website**

5. On each of your visits to our website we may automatically collect the following information:
  - technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.
6. Our website may contain links to and from other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Contact us**

7. Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [info@bankingstandardsboard.org.uk](mailto:info@bankingstandardsboard.org.uk) or St Magnus House, 3 Lower Thames Street, London EC3R 6HD.

### **Uses made of the information**

#### **Information you give to us**

8. We will use the information you give to us, for the following legitimate interests:
- to store this information on the BSB's client relationship management system for record keeping purposes;
  - if you are a BSB member, to work with you as part of your membership with us (including conducting our annual assessment);
  - to manage any queries or disputes you may have with us or that we have with you; and/or
  - to enforce our terms of use with you or any other contract we may have with you.
9. To pursue the legitimate interests referred to in this privacy policy, we rely on software applications and other technology to process personal data about you. These include the BSB's client relationship management system. The third parties we use to deliver these applications are chosen and vetted by us to ensure that, among other things, your personal data is kept secure.
10. We will also use, as necessary, the information you give to us to carry out our obligations arising from any contract (or potential contract) between you (or your employing organisation) and us, and to provide you with the information and services that you request from us.

#### **Information we collect about you from our website**

11. We will use this information for the following legitimate interests:
- to contact you if you have made an enquiry via our 'Contact Us' page on our website;
  - to administer our website and for internal operations;
  - to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible; and
  - as part of our efforts to keep our website safe and secure.

12. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive).

#### **When we disclose information**

13. To pursue one of the legitimate interests set out above, we may share your personal information within the BSB group of companies or with business partners, professional advisors, debt collectors, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
14. We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, or to enforce or apply our terms. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **Communications from us**

15. If you are an employee or representative of a member or prospective member firm, we will send you our newsletter, our annual review and details of other BSB events and activities as part of our legitimate interest in helping to promote standards of competence and behaviour in the UK banking sector.
16. If you are an employee or a representative of any other type of organisation whom the BSB has regular contact with, as part of our legitimate interest in helping to raise standards of competence and behaviour in the UK banking sector, we will keep you up to date with our annual review and details of other relevant BSB events and activities.
17. If you do not work for a BSB member, prospective member or organisation with whom we have regular contact but would like to be kept up to date with news and receive information about our annual review and details of other BSB events and activities, please let us know by subscribing on our website or writing to us. We will not send communications to you without your consent and you have the right to ask us not to use your contact details for marketing.
18. You can opt out of these communications or change your preferences at any time. If you would like to change or stop receiving communications from us, please contact us via email at [info@bankingstandardsboard.org.uk](mailto:info@bankingstandardsboard.org.uk) or write to the Communications Team, Banking Standards Board, St Magnus House, 3 Lower Thames Street, London EC3R 6HD.

#### **Transfer of personal information outside the European Economic Area (EEA)**

19. The data that we process about you may be transferred to, and stored at, a destination outside the EEA. We avoid this where possible, but it may be necessary (if, for example, one of our suppliers has a data centre outside the EEA). We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy notice. We will also ensure that the appropriate legal safeguards are in place prior to the transfer, and that any contracts between us and the recipient of the information have EU-compliant standard data protection clauses.

#### **Your rights**

20. Under data protection legislation, you have the following rights:

- **The right to rectification.** You have the right to have inaccurate personal data about you rectified.
  - **The right to be forgotten.** You have the right to request that we delete your personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing; (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.
  - **The right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing.
  - **The right to data portability.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third-party organisation.
  - **The right to object.** You have the right to raise an objection to any of our processing in paragraph 8. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.
  - **The right to object to marketing.** If you do not want us to process your personal data for direct marketing, please contact us and we will ensure that we no longer do this.
  - **The right to complain to the Information Commissioner.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have, you always have the right to lodge a complaint with the Information Commissioner's Office.
  - **The right to make a subject access request.** You have the right to access personal data we hold about you by making a subject access request.
21. If you wish to exercise any of these rights, please contact us via email at [info@bankingstandardsboard.org.uk](mailto:info@bankingstandardsboard.org.uk) or please write to the Communications Team, St Magnus House, 3 Lower Thames Street, London EC3R 6HD.

### **Retaining your personal data**

22. We will not keep any personal data about you for longer than is necessary for the purposes for which the personal data are processed. For more information about our data retention policy, please contact [info@bankingstandardsboard.org.uk](mailto:info@bankingstandardsboard.org.uk).

### **Changes to our privacy notice**

23. Any changes we make to our privacy notice will be posted on our website.

**Dated: 13 February 2020**