

Kent Reliance Provident Society Privacy Policy

Effective from June 2018

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1. Our privacy policy

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

2. About us

In this privacy policy, the terms "we", "our", and "us" are used to refer to Kent Reliance Provident Society. Kent Reliance Provident Society Limited is an industrial and provident society registered in England and Wales (registered with number 31056R) and whose registered office is Reliance House, Sun Pier, Chatham, Kent ME4 4ET.

Kent Reliance account holders are eligible for membership of Kent Reliance Provident Society. Kent Reliance, Kent Reliance Banking Services and krbs are trading names of OneSavings Bank Plc (Company Number 7312896), a company registered in England and Wales and whose registered office is Reliance House, Sun Pier, Chatham, Kent ME4 4ET. OneSavings Bank Plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (registered number 530504). OneSavings Bank Plc subscribes to the Financial Services Compensation Scheme and the Financial Ombudsman Service.

We respect your right to privacy. If you have any questions about how we use your information, then please write to: Group Data Protection Officer, OneSavings Bank Plc, Reliance House, Sun Pier, Chatham, Kent ME4 4ET. Alternatively, you can email us at: dataprotection@osb.co.uk

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

3. What personal data do we use?

We use, or process, a number of different categories of personal data. These include:

- **Information you give us / Kent Reliance** – this is information about you that you give us (including information collected by OneSavings Bank Plc) by filling in forms or by corresponding with us by phone, face-to-face, e-mail or otherwise when you apply for or register an account. The information that you give us may include your name, date of birth, financial and bank account details, contact details, current and previous address, occupation, nationality, citizenship, tax identification number and national insurance number. Other information you give us may include feedback regarding our services or our sites and responses to surveys and/or market research (although you do not have to respond to such surveys or requests). We may also collect and process records of any correspondence and communications with us and telephone calls may also be recorded. Where you provide information about others you must ensure that you have their consent or are otherwise entitled to provide this information to us.
- **Information we collect about you when you use our website** - As a visitor to our site, we may collect and process any personal information that you voluntarily submit to us through the site. This may include for example, online as well as your contact details so we can contact you for support, marketing or other purposes.
- In addition, we may also collect anonymous information about visitors to our site and the resources they access, so that we can make sure the site is meeting our and our customers' needs.

4. What do we use personal data for?

We use information held about you in the following ways:

- to administer membership of Kent Reliance Provident Society;
- to deal with your enquiries and requests;
- to facilitate periodical prize draws and any marketing communications; and
- for statistical analysis and analytics.

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

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

- **Processing of your data is necessary for the performance of a contract to which you are party to or to take steps at your request prior to entering into a contract**

When you become a member of Kent Reliance Provident Society, we require certain personal data in order to establish a contractual relationship. For example, you provide information about yourself in application forms, without which we would be unable to identify you.

- **We have obtained your consent**

We may provide you with certain marketing information where you have provided your consent for us to do so. You can ask us to stop or start sending you marketing messages at any time by contacting us.

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

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

6. Who do we share personal data with?

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

We will only disclose your information to:

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

We may disclose your personal information to third parties:

- in the event that you require us to;
- in the event that we or OneSavings Bank plc considers selling or buying any business or assets, in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets; in the event of any insolvency situation (e.g. the administration or liquidation) of One Savings Bank plc or any of its group entities;

- if we, or substantially all of our assets, are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets;
- in the event of any insolvency situation (e.g. the administration or liquidation) of OneSavings Bank plc or any of its group entities;
- if OneSavings Bank plc is acquired by a third party, in which case personal data held about customers will be one of the transferred assets;
- in order to enforce or apply our website or service terms;
- to protect the rights, property, or safety of us or OneSavings Bank plc, including staff, customers, or others; and
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or regulatory requirements.

7. Where is personal data stored and sent?

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

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (the “EEA”). In particular, OneSavings Bank plc has an operations centre in India and engages third parties that may process personal data outside of the EEA. Your personal may also be processed by staff operating outside the EEA who work for OneSavings Bank plc or for one of its suppliers. All steps reasonably necessary will be taken to ensure that your data is treated securely and in accordance with this privacy policy.

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

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

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

How long is personal data kept for?

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

8. Your rights

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

Please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer in the first instance. Our DPO can be contacted at Group Data Protection Officer, OneSavings Bank Plc, Reliance House, Sun Pier, Chatham, Kent ME4 4ET, or by email at dataprotection@osb.co.uk.

Number	Description of right
Right 1	A right to access personal data held by us about you.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	In certain circumstances, a right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right 5	In certain circumstances, a right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right 6	A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).
Right 7	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products).

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

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

9. Use of cookies

Cookies are small text files that web servers can store on your computer's hard drive when you visit a website. They allow the server to recognise you when you revisit the website and to tailor your web browsing experience to your specific needs and interests.

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

10. Links to third party sites

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

11. Changes to our privacy policy

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

Version: 1.0

Last updated: June 2018