

## **1. Your right to privacy**

Your right to privacy is important to us. Methodist Chapel Aid Limited (“the Company”) is the data controller responsible for the safe keeping of your personal information and we are committed to protecting your privacy.

This Privacy Notice summarises the ways in which we collect your information, how we may use it and with whom we share it and where we obtain your details from. It does not provide exhaustive detail of all aspects of our collection and use of personal information. If you require any further information or explanation, please contact us at Methodist Chapel Aid Limited, 1 Telford Terrace, Albemarle Road, York, YO24 1DQ.

This Privacy Notice does not extend to external websites accessed from the Company’s site. We encourage you to read the privacy statements on the other websites you visit.

## **2. Data protection legislation**

In addition to our Data Management Policy, your privacy is protected by law. We comply with the requirements of the General Data Protection Regulation (GDPR), which protects the rights and freedoms of individuals about whom personal information is processed. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside the Company. The law says we must have one or more of these reasons:

- **to fulfil a contract we have with you** - the information needed to deliver your account, product or service, e.g. we need to hold your transaction history to give you an account statement.
- **when it is our legal duty** - we are required by law to process your information, e.g. to verify your identity, or
- **when it is in our legitimate interest** - we are allowed to use your information where, on balance, the benefits of us doing so are legitimate and not outweighed by your interests or legal rights e.g. we have an interest in knowing what our customers do and do not like so that we can offer better products and services, or
- **when you consent to it** - in some cases we may obtain your consent to use information in a particular way or where the law requires consent to be obtained. Whenever ‘consent’ is the only reason for us using the information you have the right to change your mind and change or withdraw your consent.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Overleaf is a list of the main ways that we may use your personal information, and which of the reasons we rely on to do so. This table also explains what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
Checking your identity and eligibility for an account	<p>Contract performance</p> <p>Legal obligation</p>	<p>The law requires us to verify the identity of our new customers and to re-verify the identity of our existing customers from time to time. This is so we know who our customers are and to make it more difficult for criminals to use false or impersonated identities for criminal purposes, such as hiding the proceeds of crime or committing fraud.</p> <p>To verify your identity we may check the information you provide to us with credit reference agencies and publicly available information.</p> <p>We will also check that you meet the criteria to receive the product or service we are offering.</p>
Managing your account and relationships with us	<p>Contract performance</p> <p>Legal obligation</p>	<p>We will use your information to manage any account, product, service or relationship you have with us, in line with the terms of that arrangement and the rules of our regulators. Examples of this are:</p> <ul style="list-style-type: none"> <li>• Account administration, including: <ul style="list-style-type: none"> <li>○ processing your payments;</li> <li>○ maintaining an accurate history of transactions and sending account statements to you;</li> <li>○ communicating with you about your account and your relationship with us, including notifying you of changes to interest rates, charges or other terms and conditions.</li> </ul> </li> <li>• Helping to resolve any problems or complaints you may have.</li> </ul>
Assessing risk and carrying out credit assessments	<p>Contract performance</p> <p>Legal obligation</p> <p>Legitimate interest</p>	<p>We have a legitimate interest in only lending money to customers who are able to repay it. Our regulators also require us to lend money in a responsible manner. So whenever you apply for credit or any increased borrowing on an existing product, we will use the information you give us and that we may already hold to assess the risk to us.</p> <p>We may also get information from credit reference agencies and/or other sources to undertake credit scoring and/or other risk assessments of your application.</p>

What we use your personal information for	Our reasons	Our legitimate interests
Preventing financial crime and the funding of terrorism	<p>Legal obligation</p> <p>Legitimate interest</p>	<p>The law requires us to screen applications and to monitor accounts to help combat the threats posed by terrorism and money-laundering and other financial crime. We also have a legitimate interest in avoiding losses caused by financial crime such as fraud.</p> <p>We may check and share relevant information held by us with fraud prevention agencies, law enforcement and other government agencies for the purpose of preventing, detecting and prosecuting financial crime and the funding of terrorism.</p>
Recovering money that is owed to us	<p>Contract performance</p> <p>Legitimate interest</p>	<p>We have a legitimate interest in recovering debts that are due to us if there is no satisfactory plan in place to repay them. We may instruct a solicitor or other agent to act for us in recovering the debt, including by bringing legal proceedings in the courts and we will provide relevant information to them to help recover any money that is owed to us.</p>
Improving our services and computer systems	<p>Legal obligation</p> <p>Legitimate interest</p>	<p>We have a legitimate interest in making improvements to how we provide our services and to improving the security and resilience of the computer systems we use. We must also respond to any changes in law or regulation relating to the protection of the information we hold.</p> <p>We may use the information we hold to help us develop and test our systems (including new technologies and services) to ensure that they are safe and will work in the ways in which we expect them to. When we do this we will use processes and technologies that are designed to keep this information secure.</p>
Identifying other products and services that you may find useful	<p>Legitimate interest</p> <p>Consent</p>	<p>We have a legitimate interest in telling you about our products, services and any new developments that we think may interest you, but only where we are permitted to do so.</p> <p>For some marketing activity, including telling you about the products and services of other companies, we will need to ask for your consent to use your information.</p> <p>You have a legal right to tell us at any time that you don't want us to use the information we hold in this way or to withdraw any consent that you have given to us. We will only get in touch in the ways you have told us are acceptable to you. You can opt in to, or out of, receiving marketing information at any time by contacting us in the usual way.</p>

What we use your personal information for	Our reasons	Our legitimate interests
Managing and organising our business	Legal obligation  Legitimate interest	<p>We have a legitimate interest in organising and running our business in a correct and commercially sensible way and to comply with our legal and regulatory responsibilities to the UK financial system. We may use the information we hold to:</p> <ul style="list-style-type: none"> <li>• analyse how well our marketing is working</li> <li>• train our staff</li> <li>• analyse trends or behaviours we can see</li> <li>• assess the demand for (or other indicators of) a particular product or service to inform our future strategy</li> <li>• report to and communicate with our regulators, auditors and governmental agencies.</li> </ul>

Further information on the GDPR is available on the Information Commissioner's Office website [www.ico.org.uk](http://www.ico.org.uk). You can also view our registration as a data controller on the Information Commissioner's Office website under registration number Z6398996.

### 3. Information we hold about you

To enable us to provide you with an account or service, we require certain personal information about you. This includes:

- your personal details e.g. your name, address, date of birth, telephone number, email address, National Insurance number and bank account details
- depending on the account or services you apply for, we may also record additional personal information such as your income, employment details, financial commitments, or details of a credit search
- records of our contact with you e.g. system notes, correspondence or emails
- information for accounts you hold with us or have previously held with us and the transactions on those accounts
- cookies which track your activity on our website

We will not be able to provide you with an account or service if you do not supply us with the necessary information to do so, or if you do not give us your permission to process your information.

Most of this personal information will be provided by you at the time you make your application; however, there may be times when we need to seek further information from the following sources, where appropriate:

- your representatives e.g. financial adviser, solicitor, employer or any attorney appointed to act on your behalf;
- industry databases such as credit reference agencies;
- our representatives/agents e.g. solicitors, debt recovery agents;
- organisations to assist in the prevention and detection of crime; and/or
- public directories e.g. the electoral register.

#### **4. How we use your information**

We will use your information:

- to verify your identity when you apply for an account;
- to assess your application for an account. If you are applying for a car loan, this will include assessing lending and fraud risks and credit scoring;
- to open and then administer your account;
- to update our customer records;
- to respond to any query or complaint that you may raise with us;
- to carry out research and statistical analysis to enable us to improve our products and services;
- to test computer systems to ensure the continuing security and integrity of our systems;
- for crime prevention and for legal and regulatory compliance; and/or
- to identify and let you know about other relevant products and services that we offer that we think may be of interest to you

#### **5. Who we share your information with**

There are some circumstances when we will have to pass your personal information on to third parties or receive information about you from third parties. Whenever this happens, strict confidentiality conditions are always imposed. This will include:

##### **5.1 Confirming your identity**

We are required by law to verify the identity of every applicant who applies for an account with the Company. Where possible, we will try to do this electronically by using the services of specialist external agencies. If we are unable to validate your identity in this way, you will need to provide certain documents to confirm your identity.

If you are an existing customer, we may on occasions need you to re-confirm your identity, for example, if you apply for another account, add or remove signatories or change your name.

##### **5.2 Credit checking**

If you apply for a car loan with us, we will contact a credit reference agency for details of your credit history. The agency will keep a record of our enquiry ('search') and your application, whether or not this is successful.

Once your car loan account is open, we will provide the credit reference agency with details of how you conduct your account. Other lenders may access this record if you apply to them for credit.

The credit reference agency we normally use is Experian, The Sir John Peace Building, Experian Way, NG2 Business Park, Nottingham, NG80 1ZZ.

Please note that if you are applying for a joint account, the credit reference agency will make an association linking the financial records of the applicants. This may be taken into account in future applications by either or all of you, unless you successfully file a disassociation at the credit reference agency.

If you would like to see the information that the credit reference agency holds about you, please contact them directly. Please note that there may be a charge for this service.

### **5.3 Fraud prevention and detection**

We are required by Money Laundering Regulations to collect and record personal data to confirm a customer's identity.

To protect us against any fraudulent or other criminal activity we may check your details against, and share information with, fraud prevention agencies that maintain and share information on known and suspected fraudulent activity, such as Action Fraud.

We are required by law to report any suspicious transactions to the National Crime Agency, the police and other law enforcement agencies for crime detection and prevention purposes.

### **5.4 Statutory reporting**

We are required to provide information to HM Revenue & Customs about you and your savings accounts, including interest paid or charged. HM Revenue & Customs also has the right to audit our customers' accounts at any given time.

### **5.5 Market research**

To improve our products and services, we issue questionnaires about your experiences with our accounts. We will not use your information for any other purpose or share your data with other third parties.

### **5.5 Other occasions when we may be required to share your information**

In order to provide our services and fulfil our legal and regulatory obligations, we may share your information with:

- the Financial Ombudsman Service;
- regulatory authorities such as the Financial Conduct Authority and Prudential Regulation Authority;
- the Department for Work & Pensions;
- internal and external audit services;
- contractors and consultants who develop and test systems;
- providers of information for technology services;
- data processors who act on our behalf; and/or
- trade associations.

If you are applying for a loan from us, or already have a loan with us, we may share your information with:

- the Methodist Church Stipends Office to confirm your employment/income (for Car loan applications only);
- your loan intermediary/broker (where you have used one);
- legal representatives acting on behalf of you, the Company, or both; and/or
- chartered surveyors for property valuations.

The data that we collect from you is not routinely, but may be, transferred to and stored at a destination outside of the European Economic Area (EEA). These countries may not have the same standard of data protection laws as we do here in the UK. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps

reasonably necessary to ensure that your data is treated securely and protected to a similar standard.

## **6. Visitors to our website**

### **6.1 Google Analytics**

When someone visits [www.mcafundingforchurches.co.uk](http://www.mcafundingforchurches.co.uk) we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **6.2 Content management of our website**

We use a third party content management system to publish our website. This system collects anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

### **6.3 Use of cookies**

Our website uses cookies to improve the user experience. Cookies are small files, usually consisting of letters and numbers, which are put on your computer (or other device) by websites that you visit. Cookies are used very widely for a number of reasons - some are essential to the working of the website or help the website work more efficiently, and others provide information to the owners of the website.

More information on the Company's Cookies Policy can be found by clicking on the link on our website.

### **6.4 Security and performance of our website**

We use a third party service to help maintain the security and performance of the Company's website. To deliver this service, it processes the IP addresses of visitors to the Company's website.

## **7. Job applicants, current and former employees**

When individuals apply to work for us, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party e.g. by taking up a reference or requesting a Disclosure and Barring Service (DBS) check, we will not do so without first informing them unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, after which it will be destroyed.

Once an individual takes up employment with us, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that individual's employment. Once their employment with the Company has ended, we will retain the file in accordance with the requirements of our data retention schedule and then destroy it.

## **8. Shareholders**

We maintain a record of certain details of our shareholders. These include the shareholders' names, addresses and details of their shareholdings.

## **9. Emails**

If you send an email to us, please be aware that email is not a secure method of communication and we strongly recommend that you do not send confidential information this way.

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with our internal policies. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

## **10. Accessing or changing your personal information**

If any information we hold about you is incorrect or out of date, please let us know and we will correct it.

You have the right to request access to the personal information we hold about you. This is known as a Subject Access Request. Subject Access Requests must be made in writing to the Company at Methodist Chapel Aid Limited, 1 Telford Terrace, Albemarle Road, York, YO24 1DQ.

This information will be made available free of charge and within 1 month of any request. This can be extended by a further two months where the request is complex or numerous.

We will verify your identity using reasonable means before the information is released.

## **11. Other rights**

This section explains about your right to object and other data privacy rights you have – as well as how to contact us about them.

You can object to us keeping or using your personal information. This is known as the 'right to object'.

You can also ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to erasure' or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.

You can ask us to restrict the use of your personal information if:

- It is not accurate
- It has been used unlawfully but you don't want us to delete it
- It is not relevant any more, but you want us to keep it for use in legal claims
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it

If we do restrict your information in this way, we will not use or share it in other ways while it is restricted.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>.

If you want to object to how we use your data, ask us to delete it, restrict how we use it or require further information on how to make a complaint to the Information Commissioner's Office, please contact us by email at [info@mcafundingforchurches.co.uk](mailto:info@mcafundingforchurches.co.uk) or write to us at Methodist Chapel Aid Limited, 1 Telford Terrace, Albemarle Road, York, YO24 1DQ.

### **11. Unsubscribing from marketing**

If you do not wish to receive marketing information from us, please email [info@mcafundingforchurches.co.uk](mailto:info@mcafundingforchurches.co.uk) or write to us at Methodist Chapel Aid Limited, 1 Telford Terrace, Albemarle Road, York, YO24 1DQ.

You will continue to receive statutory information such as account statements, and changes to your account terms and conditions or interest rate.

### **10. Data security**

We implement reasonable and appropriate security measures (including encryption) against unlawful or unauthorised processing of personal data and against the accidental loss of, or damage to, personal data in accordance with our internal data security policy. In addition, we limit access to your personal data to those employees who have a need to know and are subject to a duty of confidentiality.

We have put in place reasonable and appropriate procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.