FAIR PROCESSING NOTICE ("FPN")

Kensington

This document sets out how and why we process data about you, the reasons for doing so, and sets out your rights relating to Data Protection legislation.

For the purposes of the UK General Data Protection Regulation and the Data Protection Act 2018 (together "the Data Protection Legislation"), we are the data controller of the information we collect and use about you.

1 We get information about you in different ways, for example:

- information you give us or other companies in our group when you apply for a mortgage or at other times;
- what we or other companies in our group learn from our relationship with you and the way in which you run your mortgage account(s). References to our "group" refer to the group of companies owned by Barclays PLC;
- public records like the Electoral Register, County Court Judgments (CCJs) and bankruptcies;
- from people such as your past and current employers, solicitors, intermediaries such as mortgage brokers, debt counsellors, lenders, landlords, accountants, banks, tax offices and insurers, who may provide references or other information about you to help with our lending decisions;
- people who give us information to help check your identity and credit history, check for crime (such as fraud and money laundering) and carry out regulatory checks; and
- when you speak with us on the telephone, as calls may be recorded to comply with our legal obligations as well as for training and quality purposes.

2 We may use information about you to:

- carry out the checks mentioned in 1, and prevent and detect fraud, money laundering and other crime;
- verify your identity and the identity of your spouse, partner or other directors/ partners;
- seek references and more information about you where we think it is reasonably necessary to decide whether to lend to you;
- decide whether to give you a loan and (later) whether to increase your loan or offer you other products;
- refresh the information we already have about you, for example to make enquiries with Credit Reference Agencies to check whether you can afford the mortgage and any further lending;
- make credit decisions about you to help us to administer your mortgage account;
- set up and run our relationship with you, and collect your payments;
- assist us in arrears handling and debt collection;
- help run and improve our business;
- market other products to you where we have your consent;
- meet our obligations to any relevant regulatory authority;
- carry out assessment and analysis (including credit and/or behaviour scoring, market, product and email tracking analysis) to develop and improve our services to you and other customers. This may include the use of data analytics, artificial intelligence and generative artificial intelligence which may be serviced by third-party providers.

3 We may give information about you to:

- others to do similar checks to us (or to people who store and share information to help others do such checks);
- affiliates and other businesses in our group, to use in the same ways as us;
- people giving you or us services (for example intermediaries such as mortgage brokers, solicitors, valuers, insurers, debt counsellors, debt collectors, analytic and market research firms and people funding us or running your account for us), to use as reasonably needed for those services;
- people giving you advice/your advisers (including but not limited to accountants, lawyers or other professional advisers) where authorised by you;
- any party with whom you or your agents have or are considering entering into a contractual agreement in relation to any mortgage;
- anyone to whom we may transfer our relationship with you (or part of it), to prepare for the transfer and, if the transfer goes ahead, to use in the same ways as us;
- any actual or proposed purchaser of your mortgage or anyone who takes a charge over it and any person involved in its funding or who has or intends to acquire an interest in your mortgage (securitisation entities) and all their advisers;

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- anyone we reasonably think we should (or can) give the information as required by law;
- any actual or proposed third party guarantor of your obligations under the mortgage, or any third party provider of security or insurance for our benefit in connection with your loan;
- any actual or proposed buildings and/or contents insurer;
- regulatory bodies and industry bodies relevant to us and our group such as the Financial Conduct Authority, the Prudential Regulatory Authority and UK Finance, (and their successors);
- Fraud Prevention Agencies, Credit Reference Agencies, Information Commissioner's Office, the police and any other relevant law enforcement agency;
- the Land Registry, the Registers of Scotland and HM Revenue & Customs and other similar bodies;
- any other party who it may be necessary to inform in connection with any contemplated litigation; and
- if you have a joint account, we may give information about one of you to the other (or others) of you.

4 Special category data

We may use sensitive (special category) data about you for the purpose of processing the application and for the duration of the mortgage to run our relationship with you. We may ask you first if we are going to do this, for example when you apply for a mortgage, but at other times we may use sensitive data about you without confirming your consent, including where we need to do so to protect your interests or to comply with legal requirements. Special Category data may include information relating to your health, religion, and commission of offences or court proceedings. For example, if you ask us not to telephone you on particular religious holidays, we would need to record this on your file. We may also keep a record of any health issues you tell us about, as we are required by the Financial Conduct Authority (FCA) to identify vulnerable customers to ensure we treat them fairly.

5 Criminal records and offences data

We may use this category of data to satisfy our risk requirements in deciding to lend to you, or for the purposes of fraud prevention or any other requirement that we are obliged to undertake by law.

6 Credit reference agencies ("CRAs")

In order to process your loan application, we will perform credit and identity checks on you with one or more Credit Reference Agencies ("CRAs"). Where you take a loan or other product from us we may also make periodic searches at CRAs to manage your loan account with us.

To do this, we will supply your personal information to CRAs and they will give us information about you. This will include information from your credit application and about your financial situation and financial history. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and CIFAS fraud prevention information.

We will use this information to:

- Assess your creditworthiness and whether you can afford to take the product;
- Verify the accuracy of the data you have provided to us;
- Prevent criminal activity, fraud and money laundering;
- Manage your account(s);
- Trace and recover debts; and
- Ensure any offers provided to you are appropriate to your circumstances.

We do not utilise CRA 'scores' to make lending decisions; we only use factual account history records as provided by the CRAs. We will continue to exchange information about you with CRAs while you have a relationship with us, including whether or not you make your loan repayments on time, if you default on your mortgage, if we take possession of your property or enter into any repayment arrangements. If you have a loan and do not repay in full and on time, CRAs will record the outstanding debt. This information may be supplied to other organisations by CRAs. This reporting may make obtaining future credit more difficult.

When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders.

A number of searches within a short period may impact on your ability to obtain credit.

If you are making a joint application, or tell us that you have a spouse or financial associate, we will link your records together, so you should make sure you discuss this with them, and share with them this information, before lodging the application. CRAs will also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail in the Credit Reference Agency Information Notice ("CRAIN"), a common statement developed by the 3 major CRAs. A copy of the CRAIN can be found on the homepage at www.kensingtonmortgages.co.uk. CRAIN is also accessible from each of the CRAs – clicking on any of these three links will also take you to the same CRAIN document: Transunion (www.transunion.co.uk/legal/privacy-centre/pc-credit-reference); Equifax (www.equifax.co.uk/privacy-hub/crain); Experian (www.experian.co.uk/crain).

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7 Fraud prevention agencies ("FPAs")

7.1 General:

- Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.
- The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.
- Details of the personal information that will be processed are, for example: name, address, date of birth, address, contact details, financial information, employment details, and device identifiers, including IP address.
- We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the loan or other product you have requested.
- Fraud prevention agencies may use the personal data which you have provided in connection with the development and usage of artificial intelligence and machine learning models.
- Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

7.2 Automated decisions:

- As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk, if our processing reveals your behaviour to be consistent with that of known fraudsters or money launderers; or is inconsistent with your previous submissions; or you appear to have deliberately hidden your true identity.

7.3 Consequences of processing:

- If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or to employ you, or we may stop providing existing services to you.
- A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details provided.

7.4 Data transfers:

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

7.5 Your rights:

- Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data; request that your personal data is erased or corrected; request access to your personal data.
- For more information or to exercise your data protection rights see section 13 below or please contact us using the contact details provided.
- You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.

8 Insurance and database registers

We may give information about you (and any incident you tell us about) to insurance database registers to share with other insurers. The insurance database registers may also give us information from other insurers about your insurance history.

9 Your financial associates

We, other businesses in our group, CRAs and FPAs may link you (or may already have linked you) in our records with others who are financially "associated" with you. They may include, for example:

- anyone applying jointly with you now or in the past;
- your husband, wife or partner (and maybe, as appropriate, other members of your family and household); or
- your business, if you are a director or partner in a small business.

For the purposes of this application you may be financially linked as your application will be assessed with reference to any "associated" records.

We and other lenders may take this association into account in future applications for credit or financial services.

You will stay linked to a financial associate until you (or your financial associate) successfully apply to the record keepers for "disassociation".

Whenever we get, use or give others information about you, we may do the same (for related purposes) with information about your financial associates.

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10 Our legal basis for processing your data

In most cases our use of your personal data is necessary for the administration of our agreement with you or for the purposes of our legitimate interest in running our business. However sometimes we process your information because we have a legal obligation to do so, for example to carry out anti-money laundering checks, or where it is in the public interest. In other cases we will ask for your consent before we process your data.

11 Transferring information overseas

All countries in the European Economic Area as well as the UK have similar standards of legal protection for information about you. We may give the information to people in countries outside the European Economic Area which are not considered to have the same level of data protection as in the EU. If we do this, we will require the people with whom we share your information to protect it to at least UK standards (for example by imposing contractual obligations on them).

12 Automated decisions

- We may use credit scoring methods or other automated decision-making systems to check your identity, help us decide whether to lend to you and (later) to run our relationship with you.
- Following completion of your mortgage, we may use automated systems for the purposes of research carried out in connection with the mortgage lending business, some of which are legal obligations.
- If we decide not to progress your mortgage application, your intermediary will be informed and if the decision is based solely on automated decision making systems, you will be given an opportunity to appeal in writing.
- You have rights in relation to automated decision making, in that you may seek manual intervention including reassessment of any automated decision. If you want to know more please contact us using the details provided in section 17 below.

13 Your data, your rights

You may exercise several rights in relation to the data we process about you. These are:

13.1 Access to your Personal Data:

We will tell you whether we process personal data concerning you, and provide you with the required information about that processing, as well as a copy of the personal data. There is no charge for this, unless the request is disproportionate or excessive, or if you request additional copies.

If you wish to exercise this right, please telephone on 0333 300 0921 between the hours of 9am to 5:30pm, Monday to Friday or write to us at PO Box 831, Redhill, RH1 9NJ, or send a secure message using our online customer portal if you are registered with us stating that you are making a "Data Subject Access Request".

You can also send your request via email to the following email address dsar@kensingtonmortgages.co.uk. Please note we will seek to verify your identity when receiving such a request.

13.2 Rectification:

Please let us know if you believe that we are using any inaccurate or incomplete personal data about you.

13.3 Other rights:

As determined by Data Protection Legislation, you may ask us to:

- Erase the personal data we hold and use about you (right of erasure);
- Restrict the way in which we hold and use your personal data (right of restriction);
- Provide you with your data in a re-usable structure, or transmit this to another party as your request (Right of Data Portability);
- Stop holding or using your data for specific reasons, including marketing (right to object).

Please note that in most circumstances we are unable to cater for these requests as your personal information is necessary for the processing of your mortgage.

13.4 Automated processing:

You also have the right not to be subjected to a decision based solely on automated processing (e.g. taken solely by a computer) where this decision has a legal or otherwise significant effect on you.

- If you would like to exercise any of the rights mentioned in 13.2, 13.3, and 13.4, or for further information in relation to the way in which we process your data, please contact our Data Protection Officer on DPO@kensingtonmortgages.co.uk or write to The Data Protection Officer, via the details in section 17 below.
- You can find out more about your rights, and how to exercise them, or refer any concerns you have to the Information Commissioner's Office (www.ico.org.uk or call their helpline on 0303 123 1113).

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14 Marketing preferences

Your mortgage intermediary will have confirmed your marketing preferences to us when he submitted your mortgage application and confirmed whether you consent to us contacting you to tell you about other financial products that may suit you and give your information to other people to do the same. If you need confirmation of what marketing preferences you have selected please ask us or your intermediary.

If you change your mind in the future you can withdraw your consent to marketing at any time by telling us.

15 How long will personal data be retained?

Records shared with credit reference agencies remain on file for 6 years after they are closed, whether settled by you or defaulted.

We store other information for as long as it is necessary for the purposes for which we collected it, in accordance with the Data Protection Legislation.

16 Who controls my data?

The data controller of your information is Kensington Mortgage Company Limited.

17 Queries and complaints

Data Subject Access Requests can be sent via email to the following email address dsar@kensingtonmortgages.co.uk or via our online customer portal by registered users.

If you have any questions about how your personal data is used or wish to complain, please contact us at:

The Data Protection Officer
Kensington Mortgage Company Limited
PO Box 831
Redhill
RH1 9NJ

DPO@kensingtonmortgages.co.uk

You have a right to complain to the Information Commissioner's Office (www.ico.org.uk), whose contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Tel: 0303 123 1113 (local rate).

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