



# Privacy Notice - CCTV, Suppliers & Visitors

October 2022

## 1. INTRODUCTION

We take our obligations under data protection law very seriously and we're committed to keeping your personal data secure.

Data Protection law, including the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR), imposes obligations on us as a "data controller" when we collect, hold, amend, share or otherwise use or erase/destroy (collectively referred to as "processing") your personal data. It also gives you, as the "data subject", rights over your personal data.

One such obligation is to process your personal data fairly, lawfully and in a transparent manner. This privacy notice is designed to help you understand what personal data we hold, why it is required, and how it is used. It also sets out some of your legal rights.

## 2. ABOUT US

OSB GROUP PLC is the London Stock Exchange listed entity and parent company for a specialist lending and retail savings group of companies (OSB Group) including OneSavings Bank plc and Charter Court Financial Services Limited, which are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

In this privacy notice, the terms "we", "our", and "us" are used to refer to the relevant subsidiary/trading name and "data controller" for your personal data or, where applicable, to the OSB Group. Subsidiaries and our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, may change from time to time and references to the OSB Group include successors in title and any other person who is for the time being entitled at law to the benefit of the mortgage or loan product. Subsidiaries and trading names in the OSB Group include:

- 5D Finance Limited
- Broadlands Finance Limited
- Charter Court Financial Services Group PLC
- Charter Court Financial Services Limited
- Charter Mortgages Limited
- Exact Mortgage Experts Limited
- Guernsey Home Loans Limited
- Heritable Development Finance Limited
- Interbay Asset Finance Limited
- Charter Savings Bank
- Interbay Funding Limited
- Interbay ML Limited
- Jersey Home Loans Limited
- Kent Reliance
- Kent Reliance Property Loans
- OneSavings Bank PLC
- Precise Mortgages
- Prestige Finance Limited
- Reliance Property Loans Limited
- Rochester Mortgages Limited

We respect your right to privacy. If you have any questions or concerns about how we use your information, our Data Protection team will be happy to assist you. Please write to:

**Group Data Protection Officer**

**OSB GROUP PLC**

**OSB House, Quayside, Chatham Maritime, ME4 4QZ**

Alternatively, you can email us at: [dataprotection@osb.co.uk](mailto:dataprotection@osb.co.uk)

Please read the following carefully to understand our practices regarding your personal data and how it is processed.

### 3. WHO THIS PRIVACY NOTICE APPLIES TO

This privacy notice explains how we will use the personal data of:

- our suppliers and potential suppliers;
- visitors, including external contractors, to our premises, and
- other persons captured on CCTV operated by us

each such person is referred to as “you” and “your” in this privacy notice.

### 4. HOW WE OBTAIN YOUR PERSONAL DATA

The data we hold about you will be provided by or obtained from you, your employer, the person(s) you visit when you visit our premises, persons working on our behalf or providing services to us, other companies within the OSB Group or are images captured on CCTV. We may also obtain data about you that is publicly available such as from the Electoral Register, the Internet, Companies House and the Land Registry.

### 5. THE TYPES OF PERSONAL DATA WE HAVE ABOUT YOU

We may process a wide variety of data about you, where necessary, for the purposes set out in the “How we use your personal data” section, including data about:

<b>You as an individual</b>	<ul style="list-style-type: none"><li>• Name and title</li><li>• Address and email address</li><li>• The company you work for</li><li>• Car registration number</li><li>• The details of any accidents you have on our premises</li><li>• Your image including your image captured on internal and external CCTV</li><li>• Time and date of entry to and departure from our premises</li><li>• and if you are a supplier of services or employed by a supplier to us:<ul style="list-style-type: none"><li>• Date and place of birth</li><li>• Background checks carried out by your employer</li></ul></li></ul>
-----------------------------	---

### 6. HOW WE USE YOUR PERSONAL DATA

We use information held about you in the following ways:

<b>Enable you to visit us and use our car park</b>	<p>This will include to:</p> <ul style="list-style-type: none"><li>• Authorise, grant, administer, monitor and terminate access to our premises and car park</li><li>• Record, monitor and report accidents</li><li>• Ensure that our suppliers and their employees meet the standards we expect for suppliers visiting or working on our sites</li></ul>
<b>Monitor our premises and surrounding areas</b>	<p>This will include to:</p> <ul style="list-style-type: none"><li>• Assist in the prevention or detection of crime</li><li>• Assist in the identification and prosecution of offenders</li><li>• Monitor the security of our business premises</li><li>• Ensure that health and safety rules and company procedures are being complied with</li><li>• Assist with the identification of unauthorised actions or unsafe working practices</li></ul>
<b>Manage our relationship with our suppliers and potential suppliers</b>	<p>This will include, where you are a supplier of services or employed by a supplier to us, to:</p> <ul style="list-style-type: none"><li>• Undertake due diligence on our suppliers or potential suppliers</li><li>• Administering the contracts we have with our suppliers</li><li>• Provide our suppliers with information about your attendance at our premises and performance of the contract</li><li>• Contact you</li><li>• To deal with complaints and disputes that may arise</li></ul>
<b>Identify, prevent and investigate crime</b>	<p>This will include to:</p> <ul style="list-style-type: none"><li>• Detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime</li><li>• Identify and prosecute offenders</li><li>• Identify a victim or witness</li></ul>

<p><b>Comply with our legal, contractual and regulatory obligations, codes of practice and to run our business</b></p>	<p>This will include to:</p> <ul style="list-style-type: none"> <li>• Provide data, reports and returns when required by a court order or other legal or contractual obligation</li> <li>• Manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties</li> <li>• Manage risk for us our, customers, clients and suppliers</li> <li>• Seek advice from our advisers</li> <li>• Comply with any other legal obligation imposed on us, including where you have sought to exercise your legal rights</li> </ul>
<p><b>investigate and respond to complaints, disputes and where necessary to bring or defend legal claims</b></p>	<p>This will include to:</p> <ul style="list-style-type: none"> <li>• Identify and document facts and evidence</li> <li>• Investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims</li> <li>• Allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services</li> </ul>

## 7. MARKETING

We may contact you about products or services offered by post, electronic mail, telephone, SMS text messaging and any other online or interactive media if, when we collected your personal data, you consented to receive marketing communications or in certain circumstances have not opted out of marketing communications.

You can ask us to stop or start sending you marketing messages at any time by contacting us. You can also unsubscribe from electronic marketing communications by using the ‘unsubscribe’ function.

## 8. THE LEGAL GROUNDS WE RELY ON TO PROCESS YOUR 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 rely on the following legal grounds in order to process your data:

- **We have obtained your consent**
  - We may process certain information where you have provided your consent for us to do so. For example, you may provide us with your explicit consent to process certain special category data such as health data (for example, to inform us about hearing difficulties) where this assists in managing our relationship with you. Where we rely upon your consent in order to process your personal data you may withdraw this consent at any time.
  - We may also provide you with certain marketing information including third party services or products where you have provided your consent for us to do so.
- **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**
  - Personal data is processed where it is necessary for our legitimate interests including to help us manage our business and to analyse, assess and improve the viability and popularity of our products. It is also processed to enable us to respond to queries, complaints and for the establishment and defence of legal rights.
- **Processing of your data is necessary for compliance with a legal obligation which we are subject to**
  - We are required to process certain personal data in order to comply with our legal and regulatory obligations including UK anti-money laundering regulations, for the purposes of ongoing fraud detection and reporting and to ensure the fair treatment of vulnerable customers.

## 9. WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal information with any member of OSB Group, which means any subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We will only disclose your information to:

- your employer;
- your representatives and advisers;
- any other person you ask us to provide information to;
- our insurers and third party insurers;
- our advisers including lawyers, accountants and auditors;
- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;

- statutory and regulatory bodies including Tax Authorities, the Information Commissioner’s Office, Prudential Regulation Authority, Financial Conduct Authority and Health and Safety Executive;
- central and local government;
- the courts and any arbitrator or adjudicator of a dispute involving us;
- law enforcement agencies.

## 10. WHERE PERSONAL DATA IS PROCESSED

Information which you provide to us is stored on our secure servers located in the UK. However, data that we collect from you may be also transferred to, or processed in, a destination outside the UK. In particular, we have operations centres in India which access and process data and we engage some third parties that may store or process personal data outside of the UK. Your personal data may also be processed by staff operating outside the UK who work for us or for one of our suppliers. This includes staff engaged in the processing of your payment details and the provision of support services.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. In particular, when personal data is processed outside of the UK, we will make sure appropriate safeguards are in place, in accordance with legal requirements, to protect the data.

In all cases these safeguards will include one of the following:

- Sending the data to a country that’s been approved by the UK Government as having a suitably high standard of data protection law.
- Putting in place a contract with the recipient containing terms approved by the UK authorities as providing a suitable level of protection.

## 11. HOW LONG IS YOUR DATA KEPT FOR

Data collected	How long we normally keep data for
Visitors Book	3 months
CCTV	90 Days
Accident Book	3 Years
Suppliers or Employees of suppliers	for 7 years from the end of the contract with the supplier
Electronic access records	Indefinitely

We may retain the data for longer where it is necessary for us to do so because:

- it is or may be subject to or form part of a complaint, dispute or investigation;
- to meet our legal or regulatory obligations, or
- for research or statistical purposes or technical reasons.

## 12. IF YOU CHOOSE NOT TO GIVE US PERSONAL DATA

If you do not provide the information requested we may not give you access to our premises or it may affect how we are able to manage our relationship with our suppliers or potential suppliers.

## 13. 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:

Right	Description
<b>Right to be informed</b>	A right to be informed about how we collect and use your personal data.
<b>Right of access</b>	A right to access personal data held by us about you
<b>Right to rectification</b>	A right to require us to rectify any inaccurate personal data held by us about you.
<b>Right to erasure</b>	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 solely on your consent; or where you object to the way we process your data (in line with the right to object below).
<b>Right to restrict Processing</b>	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 still require the data for the purposes of dealing with legal claims.

<b>Right to data portability</b>	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.
<b>Right to object</b>	A right to object to our processing of personal data held by us about you in certain circumstances (including where the processing is necessary for the purposes of the legitimate interests pursued by us or a third party). You also have the right to withdraw your consent, where we are relying on it to use your personal data; or ask us to stop processing your data for direct marketing purposes.
<b>Rights related to automated decision making including profiling</b>	In certain circumstances, a right not to be subject to a decision based solely on automated processing (without any human involvement), including profiling.

You may contact us using the details on our website (or by contacting our Data Protection team directly – details above) to exercise any of these rights. We will acknowledge, and normally action, a request received from you within one month from the date we receive the request. However, as outlined above some rights are restricted and we may not always be able to action your request.

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, we would encourage you to contact us. You also have the right to make a complaint to the Information Commissioner’s Office (ICO):

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

Please call **0303 123 1113** or visit **[ico.org.uk/global/contact-us](https://ico.org.uk/global/contact-us)** for up to date information on contacting the ICO.

#### **14. SECURE ONLINE SERVICES**

We use appropriate technical and organisational measures to protect the information we collect and process about you and our online services are provided using secure servers. We use Secure Sockets Layer (SSL) software to encrypt information, in order to protect your security.

We regularly review our systems and process to ensure our online services are provided using secure servers, however, no Internet transmission can ever be guaranteed 100% secure. We recommend that you install, use and maintain up-to-date anti-virus, firewall and anti-spyware software on your computer to better protect yourself.

You must ensure that you log out of your account at the end of an online session (where applicable) and never leave your computer unattended when logged in.

#### **15. 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. If you wish to restrict or block the cookies which are set by us, you can do this through your internet browser settings or the cookies preference management tool on the relevant website.

Further information about our use of cookies can be found on each website.

#### **16. LINKS TO THIRD PARTY WEBSITES**

Our websites 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 they have their own privacy notice and we do not accept any responsibility or liability in relation to third party websites. Please check the relevant privacy notice before you submit any data to these websites

#### **17. CHANGES TO OUR PRIVACY NOTICE**

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