



# Privacy Notice - Shareholders and Investors

September 2022

## 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.

## 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.

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. 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**
- **InterBay Financial I Limited**
- **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.

## Who this privacy notice applies to

This Policy applies to you if you are an individual and are a current or former registered shareholder of OSB GROUP PLC or bondholder of OneSavings Bank plc. This Policy extends to the share registry services which are provided by Equiniti Limited (Equiniti) on behalf of OSB GROUP PLC and any subsequent registrar. Under the rules of the Companies Act, we have appointed Equiniti to manage our registry of shares and bonds. Equiniti's role as Registrar includes keeping an up to date record of shares held by shareholders and certain bondholders, administration of shareholder and bondholder payments managing share and bond transfers, issuing share and bond certificate, amongst other things. In order to perform registry services, Equiniti processes personal information about you as a shareholder or bondholder on our behalf. For more information on how Equiniti process your personal data please visit [equiniti.com/uk/privacy-policy](https://equiniti.com/uk/privacy-policy).

If you are a customer then we collect and use information about you in accordance with our product specific privacy policies, which can also be found on the Privacy Policy page of our website.

## How we obtain personal data

When you register as a shareholder, we may collect and process any personal information that you voluntarily submit to us directly or through your agent, stockbroker or share plan administrator.

## The types of data we use

Personal data we collect includes the following:

- name and contact details;
- details of categories and classes of shares you hold;
- details of any disability you may have informed us in order to deliver services to you (for example if you opt to receive your shareholder documents in alternative/accessible formats);
- a record of your attendance at our annual general meeting (AGM);
- your bank/building society account details where you have provided these for the purposes of receipt of dividend payments; and
- any personal data you provide us through your communication with us.

In addition, we also collect information about visitors to our website and the resources they access, so that we can make sure the site is meeting our and our customers' needs.

## How we use your personal data

We use information held about you in the following ways:

- to manage your interest as a shareholder of OSB GROUP PLC or a bondholder of OneSavings Bank plc;
- to confirm your identity and validate your ID documents in order to keep the shareholder register up to date;
- to enable you to exercise your rights as a shareholder in accordance with our Articles of Association and applicable laws;
- to allow us to communicate with you for shareholder-related purposes. For example, to provide information about dividends, resolutions, the annual report and accounts, notice of our AGM and any other relevant information you are entitled to in relation to your OSB GROUP PLC shareholding;
- to deal with any enquiries, requests and complaints you raise with us as a shareholder;
- to meet any of our tax, legal or regulatory obligations; and
- for statistical analysis and analytics.

## 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:

- **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 and market abuse regulations and for the purposes of ongoing fraud detection and reporting.

## 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:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- third party suppliers and service providers including providers of services in respect of anti-money laundering, fraud, verification, etc.;
- your advisers (such as lawyers and other professional advisers) who you have authorised to represent you, or any other person you have told us is authorised to give instruction on your behalf (such a power of attorney or a proxy);
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties;
- any investor, potential investor, funder, purchaser in or of our business or any part of our business and their advisers;
- 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:

- if you require us to;
- in the event that we consider selling or buying any business or assets, in which case we may disclose your personal data to any prospective sellers or buyers of such business or assets;
- 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 OSB GROUP PLC or any of its Group entities;
- in order to enforce or apply our website or service terms;
- to protect the rights, property, or safety of us, our staff, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of staff and customer safety, crime prevention, fraud protection and credit risk reduction; 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, or otherwise for the prevention or detection of fraud or crime.

## 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.

### How long personal data is 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 anonymise or delete it. The retention period may vary depending on the purposes for which the information was collected.

Where a specific legal or regulatory requirement applies to your information we will retain it for at least the period of time specified in such legal or regulatory requirement. In the absence of a specific legal or regulatory requirement, we will usually retain your information for up to seven years. The legal limitation period for bringing legal claims is six years where the claim arises from a simple contract.

### 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:

<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.

### 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.

### 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.

### 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.

### 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.

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**For customer service and training purposes, calls with OSB Group plc may be monitored and/or recorded.**



OSB GROUP PLC is the listed entity and parent company for OneSavings Bank plc. 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). We subscribe to the Financial Services Compensation Scheme and the Financial Ombudsman Service.

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