

# CUSTOMER PRIVACY NOTICE

(Use of Personal Information)



## Information about us

Vida Bank Limited trading as Vida Homeloans (“Vida Homeloans”, “we” or “us”) is a data controller and gathers and uses information about you. Details of our notification to the regulator for data protection may be found in the Information Commissioner’s Office Public Register of Data Controllers at [www.ico.org.uk](http://www.ico.org.uk) under registration number ZA161427.

The [www.vidahomeloans.co.uk](http://www.vidahomeloans.co.uk) website and its webpages (the “Site”) are also operated by Vida Bank Limited, whose registered office is at 1 Battle Bridge Lane, London, SE1 2HP (“Vida Bank”).

If you require any further information, please contact our Data Protection Officer:

The Data Protection Officer  
Vida Bank Limited  
1 Battle Bridge Lane  
London  
SE1 2HP

Email: [dataprotectionoffice@vidabank.co.uk](mailto:dataprotectionoffice@vidabank.co.uk)

Phone: 01784 4618561

## Key summary

This is our ‘Privacy Notice’. It is referred to in the terms and conditions governing any loan with us as the ‘Use of Information Statement’. The purpose of the Privacy Notice (or Use of Information Statement) (“the Notice”) is to set out the purposes for which, and the manner in which, we may collect and use personal information that we may obtain about you. We collect data about you when you use our services.

The UK General Data Protection Regulation requires Vida Homeloans to manage personal information in accordance with the General Data Protection Regulation Principles. In particular, Vida Homeloans is required to process your personal information fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us in order that we may provide the product or service that you require.

All our employees are personally responsible for maintaining customer confidentiality. We provide training to all employees to remind them about their obligations. In addition, our policies and procedures are regularly audited and reviewed.

## Who this Notice covers

This Notice explains how we will use the personal data of:

- Individuals who request a decision in principle on whether we would grant a loan to them
- Individuals who apply for or take out a loan with us
- Individuals who become or apply to become a party to an existing loan
- Individuals who currently or may in the future guarantee a loan with us
- Directors, company secretaries and shareholders of any company that takes out a loan with us
- Other individuals whose personal data we record during the course of an application for, or the administration of, a loan
- Individuals who occupy property which is security for the loan, professional advisers, persons representing any of the above listed individuals and others, including individuals gifting part or all of a deposit to an individual who applies for a loan with us

## Fair processing notice

When you apply to us for finance, we will check records about you and where appropriate your business partners. We will check the following types of records:

- Our own records and those of Vida Bank Limited group companies

- Personal and business records at credit reference agencies (CRAs). When CRAs receive a search from us they will place a search footprint on your business and/or personal credit file that may be seen by other lenders. They supply to us both public (including the electoral register) and shared credit and fraud prevention information
- Those at fraud prevention agencies (FPAs). We will make checks such as: assessing the application for credit and verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at CRAs and FPAs to manage your account with us.

We and other organisations may access and use from other countries the information recorded by FPAs. From time to time, service providers and organisations with whom we work to provide services to you, or CRAs with which we work, may be located outside the UK or European Economic Area in countries that do not have the same standards of protection for personal data as the UK. We will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal data.

We may use your information and/or personal data when considering your loan application for the purposes of conducting market research and statistical analysis, estimating product sales, for purposes of preventing fraud and money laundering. For certain purposes, we may share your information with third parties, such as service providers or governmental bodies. This may include, but is not limited to, meeting our contractual reporting obligations or to service your account.

Your information and/or personal data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 2018.

Vida Homeloans is a trading style of Vida Bank. Your information and/or personal data will be shared therefore with Vida Bank, and within Vida Bank Limited group companies both now and in the future as we develop business.

#### **The type of personal information we collect:**

We currently collect and process the following information:

- Your contact details including your name, address, phone number and email address;
- Information about your financial status, including your employment status, income and existing debts; and
- Identification and verification details.

#### **Where necessary this may include data about:**

- Information relating to you as an individual including:
  - your name, title and address (including previous names and addresses)
  - other contact details including email address and telephone number
  - your gender, date of birth and marital status
  - your expected retirement age
  - your nationality
  - your national insurance number and tax code.

#### **Information about your employment status including:**

- your employer(s) and previous employers
- length of your employment
- your role
- your salary and other forms of income
- directorships and shareholdings you may hold

#### **Information about the people that are linked to you:**

- your family
- other people who live with you or in the property which is security for the loan
- your advisers and representatives

#### **Information about your finances:**

- your bank account details (account number and sort code) including payments to and from your accounts and finances of any business you run
- your income, assets, loans, credit cards and other liabilities you may have
- properties you own or are owned by companies of which you are a shareholder or director

- your accounts with other creditors which are to be repaid from any loan we make or are secured against the property which is to be security for our loan to you including details of the creditor, terms of the loan, account/ card number and sort code

**Information about existing accounts and products you have with us:**

- your account number
- the amount of your loan, its terms and how you will repay it
- payments to or from your loan account
- the purpose of the loan
- the property or properties which will be security for the loan

**Information about how you access the Site:**

- your device identifiers including IP address

**Information from documents we hold about you:**

- documents we hold (e.g. Driving Licence, Passport, Birth Certificate, evidence of how you intend to repay an interest only loan at the end of its term), correspondence or communications received or sent and the information contained within them

**Information from any other checks we are required by regulations to carry out:**

- any criminal convictions
- whether you are a Politically Exposed Person and/or subject to financial sanctions.

**Special category data**

Special category data is personal information that requires more protection due to its sensitive nature for example about your health, racial or ethnic origin. We will only collect this information if required by law or where we have your consent. For example, we may ask for and record information about your health when required for the management of your account, or if your circumstances may lead you to be financially or otherwise vulnerable. You are not contractually required to provide this information, and where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time.

Any special category data will only be processed where it is necessary and only with your prior explicit consent; where permitted by law to protect your well-being, or for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

**Criminal convictions**

- Any personal data on criminal convictions will only be processed as follows:
- to prevent fraud
- to comply with our legal obligations under anti Money Laundering and Financial Sanctions Legislation
- to decide whether to make a loan to you.

**What is the legal basis for our use of your information?**

Where we use your personal information, we must have a legal basis that justifies our use of your information. There are a number of legal bases under which we process your data:

**Contract**

- for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you, to fulfil our contractual obligations to you or because you have asked us to do something before entering into a contract

**Legal obligation**

- to comply with our legal and regulatory obligations

**Consent**

- if you have consented to us processing personal data for one or more specified purposes

**Legitimate Interests**

- This means the purpose is essential or relevant to our business. The legitimate interests we have for processing your personal data include to:

- comply with our legal and contractual obligations, best practice and codes of practice
- exercise our legal rights
- prevent financial and other crime
- meet your expectations of us
- enhance and develop the products and services we provide to you
- develop and improve our business, products and services and the terms which apply to them
- undertake analysis, modelling and forecasting
- manage and mitigate the risks to you and our business
- keep our records up to date and to enable us to link your different accounts with us together
- ensure that persons that are affected if the terms of the loan are not met are provided with information about the loan with us, which is appropriate to their circumstances. This will include parties to the loan, guarantors, persons with an interest or claiming an interest in the property which is security for the loan such as occupiers and other lenders with a charge secured on the property
- ensure we have sufficient information to consider any request for a decision in principle/application or to administer the loan
- verify the information provided to us to ensure its accuracy
- be efficient in running our business, providing our products and services, fulfilling our legal obligations
- contact existing customers about other products and services we offer
- ensure our business is profitable and has adequate levels of capital and funding, or facilitate investment in, and the growth of, our business.

#### **How we receive personal data**

Vida Homeloans collects personal data about you from a variety of sources including:

- from you directly or other linked applicants
- the mortgage intermediary acting for you or other persons who represent or advise you
- your bank or building society
- your employer and former employers
- CRAs and FRAs
- solicitors, valuers, and other individuals working on our behalf
- market researchers
- local and national government, tax and law enforcement agencies
- publicly available information such as from the Electoral Register, Companies House, the Land Registry and internet searches.

We will also create personal data about you during the course of the application for a loan and our administration of any loan you have with us.

#### **How do we share your personal information**

We may give information about you to the following companies and organisations who may use it for the same purposes as set out above:

- to our employees and agents or other approved third parties to administer any accounts or provide services to you on our behalf
- to approved third parties who provide services to you upon our request, including sending communications to you on our behalf
- you, your representatives and advisers including your mortgage intermediary, solicitor and accountant
- to agents who (on our behalf) profile your data so that we may tailor goods/services to meet your specific needs
- companies which your mortgage intermediary is associated for example because they are responsible for your mortgage intermediary's compliance with legal obligations or your mortgage intermediary has chosen to submit your application through or in connection with them
- parties to the loan, any guarantor of the loan, the company secretary, directors and shareholders of any company that is party to the loan
- any other person you ask us to provide information to
- to anyone to whom we transfer our rights and duties under our agreement with you
- your past/present employers
- your and our insurers
- your bank, building society and landlord
- debt management companies, your trustee in bankruptcy or the supervisor of an Individual Voluntary Arrangement
- our bank, BACS and the Direct Debit Scheme
- any occupier of the property and other persons who have or may have an interest in any property which is or is intended as security for a loan

- the freehold owner or management company of any leasehold property that is security for the loan, their representatives and advisers
- our advisers including valuers, solicitors, accountants and auditors including where necessary to protect or defend our legal rights or the legal rights of another company or person
- Law of Property Act receivers
- central and local government
- the Financial Ombudsman Service, courts and any arbitrator or adjudicator of a dispute involving us
- statutory and regulatory bodies including tax authorities, HMRC, Benefits Agency, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, Bank of England and any relevant international regulators
- CRAs and FRAs
- law enforcement agencies
- credit rating agencies
- market research companies
- any investor, potential investor, funder, purchaser in or of our business or any part of our business (including your mortgage) and their advisers
- organisations involved in any corporate finance transaction which we undertake or intend to undertake including, but not limited to, underwriters, loan servicers, trust managers and security trustees
- a potential purchaser if our business or any part of it is sold
- any business with which we are seeking to merge and their advisers
- any previous lender, or agents and suppliers who act or may act on our behalf
- to anyone we have a legal or regulatory duty to do so or if the law allows us to do so.

### **How we use your information**

We use your personal information in the ways listed below.

To process your application for finance or request for a decision in principle including to:

- assess whether we think the loan can be afforded, determine whether we are willing to make a loan and if we are, the terms of that loan
- undertake a credit assessment which will include credit scoring
- check your identity
- liaise with your mortgage intermediary to progress the application for a loan or request for a decision in principle
- liaise with the solicitor advising us on the loan including to ensure that the property or properties which will be security for the loan meet our requirements, the terms of any mortgage offer are met and we will have a charge over that property or properties
- obtain a physical or automated valuation of the property or properties which will be security for the loan and any other properties which you, or a company of which you are a director or shareholder, own to enable us to assess the amount of the loan, if any, which we are prepared to make.

To manage our relationship with you, to administer and provide the loan and other products and services you have with us including:

- contacting you about the loan, making payments and processing repayments of the loan
- to respond to queries
- managing fees, charges and interest due
- making arrears management decisions
- collecting and recovering any money owing to us
- locating you
- considering requests, you and other persons make of us to decide whether we will agree to the request being made or provide the information requested
- ensuring that we have a valid and enforceable charge over property which is, or is intended to be, security for the loan, with the priority we expected and that the title to that property is and continues to be good and marketable
- exercising our rights under the terms of our loan including obtaining possession of the property and if we do, to sell the property subject to our charge
- appointing a receiver if the loan is secured on a property that the borrower doesn't live in
- linking the loan to other products and services you, or a company of which you are a director or shareholder have with us
- creating records, producing correspondence and other documents and providing information to you and other persons
- correcting inaccurate data held by us and third parties
- identifying circumstances which may make you vulnerable so that we can take account of this in our dealings with you

- updating, consolidating and improving the accuracy of our records
- monitoring and analysing the performance of your account with us
- considering any future applications you make for a loan or requests for a decision in principle
- to tell you about products and services offered by us which we think may be of interest to you
- to make sure we and third parties that act on our behalf have the information we need to consider your application or decision in principle and to administer the account including:
- obtaining additional information about you that is publicly available or by making enquiries, searches, requesting references and other information that we consider necessary (including to confirm the truth and accuracy of your personal data, to decide whether make a loan and to administer the loan with us) from you and other persons including your mortgage intermediary, tax authorities, past/present employers, landlords, accountants, lenders, insurers, bank/building society, the Benefits Agency, Land Registry, Companies House, social media, fraud prevention agencies and credit reference agencies
- contacting, obtaining or providing information about you from or to debt management companies, trustees in bankruptcy, supervisors of individual voluntary arrangements and personal representatives
- contacting, obtaining or providing information about you from or to any other lender or person who has or may have a charge over or other interest in the property which is security for the loan.

**To identify and prevent financial crime including:**

- detecting, preventing, investigating and/or reporting suspected money laundering, fraud, bribery, corruption and other crime.

**To comply with our legal, contractual and regulatory obligations as well as codes of conduct and to run our business including:**

- sharing data about you and the conduct and operation of the loan during its term and after it is repaid with:
- any guarantor or intended guarantor of the loan
- our regulators, the Bank of England and credit ratings agencies
- our investors or potential investors, funders and their advisers
- any prospective purchaser of us, seller to us or party seeking to merge with us or any person who does or wishes to fund or otherwise be involved in any such transaction and their representatives
- any person who was previously the lender or who has an interest in the loan, their representatives and advisers; any person or organisation who does, or who we believe wishes to, enter into an acquisition of your mortgage or who does or wishes to fund or otherwise be involved in such an acquisition, their advisers and representatives. An acquisition may occur if we mortgage, sell, transfer, assign, charge or otherwise dispose of, in whole or in part any loan, mortgage, or other related security to any person or organisation. Such an acquisition will involve us transferring all or some of the rights that we have under the loan, or the related security to another person or organisation
- any organisation that participates or intends to participate in a corporate finance transaction we undertake or intend to undertake, but only where necessary for the purposes relating to those transactions including to enable those organisations to exercise rights they have and to review loan files
- credit reference and fraud prevention agencies who in turn will provide data to us
- identifying if you, a close associate or relative are subject to financial sanctions or are considered politically exposed
- providing data, reports and returns to our regulators, other statutory bodies, our trade bodies or when required by a court order or other legal or contractual obligation
- managing, monitoring, analysing, developing, forecasting and reporting on the performance of our businesses, suppliers and other third parties including accounting and auditing
- managing how we lend and use our resources
- managing risk for us and our customers
- seeking advice from our advisers
- paying fees to the introducers of business to us and to provide them with management information on the performance of their business
- complying with any other legal obligation imposed on us, including where you have sought to exercise your legal rights.

**To develop and improve our products and services including:**

- testing products and services
- obtaining your feedback on the products and services we provide
- undertaking market research
- ensuring that we meet high standards of customer service, including monitoring calls and training staff
- for profiling purposes to help us ensure that we provide you with the right information and offer you relevant services.

**To undertake analysis, produce models, statistics, reports and forecasts including:**

- predicting your economic situation and/or future behaviour
- analysing and modelling the likely future performance of your loan and other loans that we may make or be asked to make in the future.

**To investigate and respond to complaints, disputes and where necessary to bring and defend legal claims including:**

- identifying and documenting facts and evidence
- investigating and responding to complaints, disputes, regulatory investigations and/or to bring or defend legal claims
- allowing 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.

**How we use your personal information to make automated decisions**

In order to make our processes as efficient and fair as possible we will at times make an automated decision. The type of automated decisions we make may include:

- checking whether you meet the conditions required to open the account you have applied for
- checking your identity
- creating a profile of you
- deciding whether we will make a loan and the terms of any loan
- deciding whether we will offer additional products and services or the opportunity to vary existing products or services and the terms of any such products, services or variation
- identifying when there may be a risk of the terms of the loan being breached
- deciding how we will manage the account when the terms of the loan have been breached or we consider there is an increased risk that a breach may occur.

These automated decisions may also take into account details of any products you already have with Vida Homeloans and any assessment of your financial status and risks we have undertaken.

You may ask us not to make automated decisions about you by contacting our Data Protection Officer, or ask us to review any automated decision that we have made taking account of any additional information you wish to provide to us.

**Checks that we carry out and use of your personal information by credit reference and fraud prevention agencies**

When you apply to us for finance, we will check records about you to help us make a decision about whether to lend to you and the amount that we will lend. If you are a business, in addition to checking your records we will also check records of all directors and shareholders. Checks will be made on an ongoing basis should there be any changes to shareholders or directors of the business.

We will check the following types of records:

- our own records obtained via mortgage applications and account administration, both current and in the future
- personal and business records at CRAs. When CRAs receive a search from us they will place a search footprint on your business and/or personal credit file that may be seen by other lenders. They supply to us both public information (including the electoral register) and shared credit and fraud prevention information; and those at FPAs.

We will make checks such as assessing this application for credit and verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at CRAs and FPAs to manage your account with us.

**Credit Reference Checks**

When you apply to us for finance, we will perform credit and identity checks on you with one or more CRAs. To do this we supply the CRAs with personal information about you. CRAs will supply us with both public and shared credit information, information about your financial situation and fraud prevention information.

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 must be sure that you have their agreement to disclose information about them. CRAs 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. You must provide this notice to such financial associates prior to commencing the application process with us.

Information on applications as required will be sent to CRAs and will be recorded by them. Where you borrow from us, we will give details of your accounts and how you manage it/them to CRAs. If you borrow 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 and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

A joint document has been created by the CRAs known as Credit Reference Agency Information Notice (CRAIN) which explains their role, the data they hold and the ways in which they use and share that data. For full details on how credit account information sharing is conducted by CRAs and to view their full Fair Processing Notice please visit or contact:

Experian - <http://www.experian.co.uk/crain/index.html>  
Consumer Help Service, PO Box 9000, Nottingham, NG80 7WF  
Telephone: 0344 481 8000/0344 481 8000 Website: [www.experian.co.uk](http://www.experian.co.uk)

Transunion – <https://www.transunion.co.uk/legal/crain-retention>  
Consumer Services Team, PO Box 491, Leeds LS3 1WZ  
Telephone: 0330 024 7574 Website: [www.transunion.co.uk](http://www.transunion.co.uk)

Equifax - [https://www.equifax.co.uk/crain/Customer Service Centre](https://www.equifax.co.uk/crain/Customer%20Service%20Centre), PO Box 10036, Leicester, LE3 4FS  
Telephone: 0800 014 2955 Website: <https://www.equifax.co.uk/>

### **Fraud Prevention Agencies**

Before we provide 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 may include your:

- name
- date of birth
- residential address and address history
- contact details such as email address and telephone numbers
- financial information
- employment details
- identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address
- vehicle details.

When we and FPAs process your personal data, we do so 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 services or financing you have requested.

We, and FPAs, may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.

FPAs 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.

If you are a director of a company, we will seek confirmation, from CRAs, that the residential address that you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.



## **Consequences of processing**

If we, or an FPA, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you.

A record of any fraud or money laundering risk will be retained by the FPAs, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us.

## **Data transfers**

Whenever FPAs transfer your personal data outside of the UK or 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 UK or the European Economic Area. They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

## **If you choose not to give us personal data**

Where you will be a party to the loan or guarantor of the loan you will need to provide us with the personal data we request either to enable us to consider your request for a decision in principle/application or to administer the loan.

If you don't give us the information we request then it may prevent us from being able to respond to your request or provide a decision or loan to you. It may also affect our ability to meet our contractual or legal obligations.

## **Where we store your data and for how long**

All information you provide to us is stored on secure servers. We are required to keep your data while you are registered with us and for a further period of 6 years after the records are closed, whether they are settled by you or default. This is subject to our obligations to comply with the record retention requirements under the Data Protection legislation. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations, for research or statistical purposes or technical reasons.

If you apply for finance and are not successful, we keep your application information for 12 months from the termination of the application.

If we lend to you, we keep your information for 7 years from the date your mortgage with us is redeemed.

Where you have agreed to receive our marketing communications, we will keep your contact information on an on-going basis whilst we are actively communicating with you or until you ask us to stop sending you marketing communications.

## **Your data protection rights**

You have a number of rights in relation to your information:

### **1. The right to be informed**

You have the right to be informed about the collection and use of your personal data. You must be provided with information including: the purposes for processing your personal data, the retention periods for that personal data, and who it will be shared with. This information is provided within this Notice.

### **2. The right of access**

You have the right to access your personal data. The right of access allows you to be aware of and verify the lawfulness of the processing. You have the right to obtain confirmation that your data is being processed, access to your personal data and other supplementary information.

### **3. The right to rectification**

The UK GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing

### **4. The right to erasure**

The UK GDPR introduces a right for individuals to have personal data erased. You can make a request for erasure verbally or in writing. The right is not absolute and only applies in certain circumstances.

The right to erasure does not apply if processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation;
- for the performance of a task carried out in the public interest or in the exercise of official authority;
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
- for the establishment, exercise or defence of legal claims.

## 5. The right to restrict processing

You have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, we are permitted to store the personal data, but not use it. You can make a request for restriction verbally or in writing.

## 6. The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- direct marketing (including profiling)
- processing for purposes of scientific/historical research and statistics.

For more information, or to exercise your data protection rights, or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

Please note that you can also contact credit reference agencies directly in relation to any data you believe to be incorrect and/or to log a notice of correction.

Sending you personal data outside the United Kingdom and the EEA

Your personal data may be processed or transferred outside the United Kingdom and the European Economic Area.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

## Access to information

Each time you visit our site we may automatically collect the following information:

- technical information, including the internet protocol (IP) address the request came from or the one your Internet service provider assigned to you
- browser type and version
- device type
- operating system and version
- your user locale (your default preferences for dates, times, numbers etc)
- the URL where you were referred from
- any phone number used to call our customer service number.

## Cookies

Our website uses cookies. For detailed information on all the cookies we use and the purposes for which we use them please see our (Cookie policy)

## Disclosure of your information

We will treat your personal information as private and confidential, but may share it with other companies in the Vida Bank Limited group and disclose it outside of Vida Bank Limited if:

- a) allowed by this agreement;
- b) you consent;
- c) needed by our agents, advisers or others involved in running accounts and services for you or collecting what you owe group companies;
- d) needed by subcontractors to help us manage your records;
- e) HM Revenue & Customs or other authorities require it;
- f) the law, regulatory bodies (including for research purposes), or the public interest permits or requires it;
- g) required by us or others to investigate or prevent crime;
- h) needed by market research companies to assist us in providing better products and services for you;
- i) needed by any other parties connected with your account (including guarantors); or
- j) required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).

We will always ensure your information remains safe and secure. If you were 'introduced' to us by a third party and/or have a relationship, we will give them your contact details and sufficient information about you to help with their accounting and administration. Introducers may use these details to contact you about products and services unless you have asked them not to do so.

The Government also requires us to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.

## Marketing

We will ask for your consent before we use your data for marketing purposes. If you consent to receive marketing material you will be able to choose the ways by which you can be contacted and can exercise the right to opt out at any time.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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.

We may use your information and/or personal data when considering your mortgage application for the purposes of conducting market research and statistical analysis, estimating product sales, for purposes of preventing fraud and money laundering. Please note that information may be shared with third parties for account administration (such as contact management) and to meet Vida Homeloans' contractual reporting obligations.

## Information we collect about you

If for any reason you are unsure about the personal and account information we are holding in your name, please contact us. We will happily review your file and update the records if required. You have the right to ask us to correct incorrect data which we may hold about you. You also have the right upon applying in writing to obtain a copy of the information held by us about you.

For more information or to exercise your data protection rights or if you are unhappy about how your personal data has been used, please contact our Data Protection Officer.

Please note that you can contact CRAs for any data you believe to be incorrect and/or to log a notice of correction.

## How to complain

If you have any complaints about the way we use your personal information please contact our Data Protection Officer:

The Data Protection Officer  
Vida Bank Limited  
1 Battle Bridge Lane  
London  
SE1 2HP

Email: [dataprotectionoffice@vidabank.co.uk](mailto:dataprotectionoffice@vidabank.co.uk)  
Phone: 01784 4618561

If we cannot resolve any issue, you have the right to complain to the Information Commissioner:

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

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

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