

Sustainable Business Coach Application Privacy Notice



Who we are

The Sustainable Business Coach Application (“the App”) has been developed for Clydesdale Bank PLC by Life Moments Ltd. The App is owned and controlled by Clydesdale Bank PLC which trades using the brand Virgin Money.

Clydesdale Bank PLC is the data controller in respect of the personal data processed in the provision of the App services. This means that we are responsible for deciding how we hold and use your personal information. Our registered office address is 177 Bothwell Street, Glasgow G2 7ER.

Any information collected by any of the third party websites referenced in the App will be controlled by the third party. Each third party will provide their own privacy notice.

The type of information we may hold about you

The Sustainable Business Coach will use the following categories of personal information about you:

- **Personal details** (such as name, role title and email address)
- **Information relating to the sustainability of your business**
- **Device information** (such as device ID and IP address)
- **Application usage**

How is your personal information collected?

We will only collect personal information which you provide to us by using the App. We may, with your consent track your usage of the App using cookies. You can find out more about our use of cookies through our cookie notice.

We may collect information from public records and other public sources, including internet searches.

Why we need your information and what it is used for

Data Protection law requires us to have one or more reasons for using your information. These are the reasons we are relying on in relation to the App:

1. **‘Contract performance’** – the information is needed to deliver the product or service.
2. **‘Consent’** – in some cases we may obtain your consent to use information in a particular way or where the law requires consent to be obtained. Whenever ‘consent’ is the only reason for us using the information you have the right to change your mind and change or withdraw your consent. You can do this from within the App.
3. **‘Legitimate interest’** – we’re allowed to use your information where, on balance, the benefits of us doing so are legitimate and not outweighed by your interests or legal rights e.g. we have an interest in obtaining feedback on the App so we can make improvements.

Using your information

These are the main ways we'll use your information and why we do so:

- Communicate with you, ensure you can sign into your account and track your progress against high-priority sustainability issues across a variety of devices (contract performance).
- Understand where you are in the sustainability journey (using cookies) and remember your preferences, so you'll be able to return to the last page you visited on the App. This will ensure you don't need to re-input detail you have previously provided to the App (contract performance).
- Help you to understand high-priority sustainability issues impacting your business, your progress versus those issues and guidance to act on those issues (contract performance).
- To perform industry benchmarking analysis (legitimate interest).
- To contact you with service queries in relation to completion of the Sustainable Business Coach (contract performance).
- The bank may contact users of the Coach from time to time to capture feedback and discuss sustainability progress (legitimate interest).
- We will use your responses to the sustainability questions to provide a score which may be used to determine if you could be eligible for preferential borrowing rates, should you wish to borrow (contract performance/consent).

Where the legal basis we are relying on is contract performance we require your information in order to support you in your sustainability journey. Without it the App will not work.

Data sharing

We may share your personal information within our group of companies, our partners, agents, suppliers and promoters to provide the service.

Data retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purpose we collected it. We may retain it longer in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

Using information outside the United Kingdom

We may need to transfer your information outside the UK and the EEA to other Group companies, service providers, agents, subcontractors and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the UK and the EEA, such as the USA. In these cases we'll take all reasonable steps necessary to make sure your information is protected to UK standards. This may be through only allowing transfers to countries which the EU Commission has decided ensures an adequate level of protection for your information (an "adequacy decision"), or we have put in place our own measures to ensure adequate security as required by data protection law.

These measures include having recognised safeguards in place with our commercial partners, such as carrying out strict security checks on our overseas partners and suppliers, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses or where our commercial partner is a signatory to a recognised and binding code of conduct. You can find out more information about standard contractual clauses as detailed by the ICO. Visit their website at ico.org.uk and search for 'International Transfers'. To find out more about any particular uses of information in countries outside the EEA, the existence of an "adequacy decision" for that country or the safeguards we have put in place, please contact our DPO.

Rights of access, correction, erasure, and restriction

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party. To exercise any of these rights: You are able exercise your rights directly through the App, where you can manage and amend your own data preferences.

If you wish to make a Rights Request, you can do so by emailing **DSARCCA.Questions@cybg.com** or writing to the team at: Rights Request Team, Virgin Money, Sunderland SR43 4JB. The team will respond within a month and there is no need to send a reminder during that period.

Data Protection Officer

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information and comply with our responsibilities for data protection. Our DPO can be reached by post at Virgin Money, Data Protection Office, Sunderland SR43 4JB.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.