

## Your info – how we use and keep it

This Privacy Notice tells you all about what we do with your data.

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# How we use your data

These are the ways we gather data about you and what we do with it.

## About you

We learn some simple things when your parent/guardian opens your account. Your name, age, where you live, and any ID you share. We also collect info when you or they use our services or talk to us.



## Protecting you

We might share your info with other people, companies or your parent/guardian. We'll always make sure your data is protected when we do. We also look at how you use your devices to keep you safe.



## Parent/guardian access

You can ask us to switch this off when you turn 16.

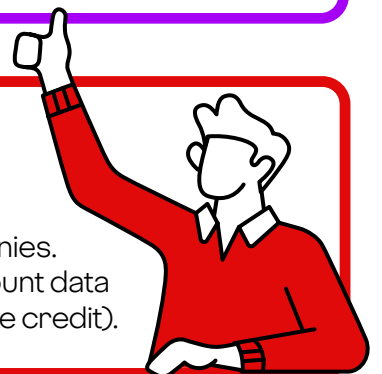


## Using your data

We use your data to check it's really you. We also use it for everyday stuff like making payments. It's all part of bossing your banking.

## Here for you

We'll never try to sell you things or sell your data to other companies. We'll also never share your account data with Experian (they check stuff like credit).



**MONEY** *Virgin*

Our full Privacy Notice is on the next few pages. Take some time to read it with your parent or guardian.

## 1. Intro

We take your privacy seriously. This section's a quick heads up on what we do with your data.

It talks about the info we have right now and what we might collect in the future. How we use it depends on a few things.

Someone called the Data Protection Officer (DPO) makes sure we protect your info and use it properly. Got any questions? Contact our DPO (see **section 13 Getting in touch**).

This M Power Privacy Notice is the newest one. We'll let you know if we make any important changes.

## 2. About the Virgin Money UK PLC Group

'Group' means Virgin Money UK PLC, Clydesdale Bank PLC, and any other related company of Virgin Money UK PLC. Head to the Legal and Privacy section for more details.

We have the following companies ('data controllers') in our group that collect and use your data.

When we say 'we' or 'us', we mean:

- Clydesdale Bank PLC
- Virgin Money UK PLC
- Virgin Money PLC
- Virgin Money Holdings (UK) PLC

## 3. What info we will keep

'Info' means the data we collect, use, share and store. This changes depending on your account or relationship with us.

It includes:

- Personal info like your name, date of birth, home address, contact details, and ID.
- Account numbers, usernames, and your National Insurance number.
- Payment and income details.
- Info from organisations like the Financial Conduct Authority or Financial Ombudsman Service.
- Info about people you're financially connected to (like your parent or guardian).
- How you use our website or app (including your IP address, location, and the device and software you're using).
- Your permission to share info from third parties.
- Any info that's legally considered special category because it's sensitive to you. We only collect and use this if you've given us permission, or it's allowed by law.

This includes:

- Race or ethnicity.
- Religious or personal beliefs.
- Trade union membership.
- Genetic and biometric data.
- Health info and data to support vulnerable customers.
- Criminal convictions and offences (to stop crime and comply with the law).

What we collect isn't limited to the things above.

Head to section 6 for more details.

We might need your info to check your ID and give you products or services like this account.

We wouldn't be able to offer these otherwise.

## 4. Where we get the info from

We collect it from different places.

That includes:

- When you or the person who opened your account call us.
- When you come to our Stores, take our surveys or chat with us online.
- When you use our products and services.
- From your financial connections.
- How you use your keyboard, mouse and/or the way you hold your device. **(Behavioural Biometrics.)**
- From the type of device you are using and the apps on that device.
- From Store CCTV and calls. We'll record or monitor phone calls for training and regulatory reasons. This improves our service and keep you and our colleagues safe. We also use CCTV on our premises for the safety and security of everyone.

**We also get info from:**

- Credit reference and fraud prevention agencies.
- Payment networks (Mastercard).
- Retailers.
- Government agencies.
- Public records and other public sources (internet searches).
- Other professional companies.
- Third parties who can share info with us.

You'll need to give permission for this sometimes. It might be combined with info we already know.

Get more details in **section 5 Why we need the info and how we use it.**

## 5. Why we need the info and how we use it

We need to have a genuine reason under data protection law.

That includes:

1. 'Contract performance' – where we use it for your account, product or service (things like sending account statements).
2. 'Legal obligation' – where we legally use your data for things like ID checks.
3. 'Legitimate interest' – we're allowed to use your info where the benefits are fair and not outweighed by your interests or legal rights (like knowing what you like and don't like to improve our services).
4. 'Consent' – we might ask for your consent or permission to use info in a certain way or where the law states we need it. This covers things like letting us record something about your health to improve our service to you. You can change your mind if permission is the only reason for us using the info. Head to section 13 to find out how to do this.

### Using your info

This is how we use it and why:

#### **To check your identity and eligibility (Contract performance; Legal obligation)**

We legally need to check your identity and re-check it sometimes too. This makes it harder for criminals to steal identities, hide money from crimes or commit fraud. We'll check your details with credit reference agencies and against public info. These checks make sure you're eligible for things we offer.

#### **To manage your account, services and relationships with us**

(Contract performance; Legal obligation; Legitimate interest)

We do this based on our terms and regulatory rules, which includes:

- Managing your account:
  - Making and receiving payments.
  - Storing transaction details and sending statements.
  - Staying in touch about your account or changing interest rates.
  - Adjusting limits or charges.

- Sharing details before someone makes a payment to you.
- Fixing any mistakes, or complaints you might have.
- Managing any offers or promotions.
- Closing your account.

We'll use your contact details, your payment and your location data to check payment locations. We do this to stop fraud. If you've agreed to it, this includes mobile location services and your IP address to make sure it's you.

We might share this info with third parties too. This helps us to confirm your details and deliver our products and services. These can include our payment providers, subcontractors, ATM services and cash management, plus other banks and regulators.

## **Obeying the law, stopping financial crime (including fraud and money-laundering) and funding terrorism**

(Legal obligation; Legitimate interest)

The law means we need to review applications and monitor accounts. This helps us tackle threats from terrorists and financial crimes. We might share info with police or other official bodies to comply with the law and prevent losses from fraud.

We might also check and share your info with fraud prevention agencies, credit reference agencies, law enforcement, other government agencies, different banks and regulators. We do this to stop financial crime and terrorism. We'll use any info you've shared with us, plus anything we know from third parties. We'll check how you use our services too.

We might share things like personal details and identification (like passport or driving licence number), your IP address and if you've been convicted of any crimes. It might also include location data to prevent crime.

## **Improving our services and computer systems**

(Legal obligation; Legitimate interest)

Improving our services and cyber security keeps you safe. We have to do it legally too.

We also might use your info to develop and test our systems, our services or new tech. This makes sure they're safe, secure and working. We'll always design them to protect your details.

## **Taking care of our business**

(Legal obligation; Legitimate interest)

We want to keep our business running smoothly. We do this by sticking to our legal and regulatory responsibilities in the UK.

That means using your details for:

- Training our team.
- Spotting trends or behaviours.
- Checking how we're doing.
- Working out profitability of our products or services compared to others.
- Reporting and communicating with official bodies.
- Confidential sharing of info to support our funding, mergers, transfers or sales.

We might use research companies to help do these things.

Sometimes, we'll use artificial intelligence to understand trends. This includes call analysis, rating our marketing, and checking or improving our products and services.

If necessary, we might also have to share your data under the law.

## **Supporting vulnerable customers**

(Legal obligation; Legitimate interest; Consent)

We'll use your info to look for any vulnerabilities like health conditions or money worries. We do this to help you and follow the law.

If we learn from other parts of our Group that you need help, to meet our legal duties, we might have to share private info with official bodies. These include the police, social services or someone acting on your behalf.

## When we make automated decisions

We use computers to:

- Okay your payments.
- Check payments to your account to help us spot fraud or other crimes.
- Check things like billing address, IP location, issuer country, and something called velocity checks. This looks at how often the card has been used. We score each payment and stop it if the score is high.

We'll look at how you might manage your account. We'll use info from lots of sources (see **section 4 Where we get the info from**). You can always ask us to reconsider if you disagree.

## 6. What we use special categories of info and criminal offence info for

We'll only use these if we've got a reason to:

1. **Explicit consent** – that's where you tell us we can for a specific purpose.
2. **Vital interests** – to protect you and your health, including a medical emergency on our premises if we need to give your details to paramedics.
3. **Public interest** – where it is in the substantial public interest.

We'll only use criminal offence info to prevent or detect crime.

## Using special categories info

We use these for different reasons:

### Health info

- Tailoring our services if we know you have any health issues.
- If you have a medical emergency in our Stores.
- Making sure you're treated fairly if you get into financial trouble.

### Genetics and biometrics

Some of our accounts use facial and other biometrics to identify you. These are things like fingerprints and Face ID. We'll always ask for your permission.

We also use **behavioural biometrics**. Things like the way you use your keyboard, mouse and/or your device. These can help us to check it's you when using your card online. We use machine learning to spot patterns, stop fraud and confirm it's really you.

### Racial and ethnic background

We ask about these to treat everyone equally.

### Criminal info

This helps us prevent and detect financial crime. It's also our legal duty.

### Account payments

Payments you make and receive can show things about your beliefs or health. We call these special categories. We won't use them for any other purpose.

## 7. Who we share info with

We treat everything as confidential. We might share it with others who also need to keep it confidential, safe and secure:

- Companies in the Virgin Money UK PLC Group.
- Our commercial partners – like our IT Suppliers.
- Third parties who also offer you services.
- Anyone we transfer our rights and duties to.
- Anyone else with your permission, including open banking (where you share your financial data).
- The person who opened your account. This is to help keep you and your money safe and enable them to help you if something goes wrong.

### We might also share your details with:

- Credit reference and fraud prevention agencies.
- Regulators and their service providers (like the Financial Conduct Authority).
- UK and overseas Tax authorities (HM Revenue & Customs).
- UK and overseas Law enforcement agencies – like the National Crime Agency.

## How we work with specific agencies

### Credit reference agencies (CRAs)

We'll check your identity with these when you apply for an account. We might also re-check later on.

We'll give them details from your application and they'll give us info about you.

We'll do this as long as you're a customer.

You can find more details in the CRA Information Notice (CRAIN) at:

- [transunion.co.uk/crain](https://transunion.co.uk/crain)
- [experian.co.uk/crain](https://experian.co.uk/crain)

We might use TransUnion for ID checks, fraud prevention and more.

Want to know more? Head to [www.transunion.co.uk/legal-information/bureau-privacy-notice](https://www.transunion.co.uk/legal-information/bureau-privacy-notice)

### Fraud Prevention Agencies (FPAs)

Protecting you from fraud is important to us. That's why we're members of CIFAS and National Hunter.

We might swap info with them to stop financial crimes.

If you're flagged as a risk, we might not offer you products or services. That could mean closing your account and sharing details with CRAs.

FPAs keep records of risks. This might stop you from getting services, products or jobs in the future.

We and FPAs might also share your info with enforcement agencies to stop crime. Want more details?

Ask a member of staff or visit:

- [www.cifas.org.uk/fpn](https://www.cifas.org.uk/fpn)
- [www.nhunter.co.uk/privacypolicy](https://www.nhunter.co.uk/privacypolicy)

## 8. Using info outside the UK

We might need to share your info outside the UK and EEA. This could include companies in countries with different data protection laws.

We'll share details with your debit card payment network (Mastercard). They might use this worldwide. We'll do everything possible to make sure your data is protected to UK standards.

This might mean limiting transfers to countries where the EU Commission believes are protected.

It could also mean introducing our own measures to meet data protection law.

These measures could mean using recognised protections. Things like strict security checks on commercial partners and suppliers overseas. It might include regulator-approved contracts or using a recognised way of behaving. Get more details at [ico.org.uk](https://ico.org.uk) and search for 'International Transfers'.

Our Data Protection Officer can give you details on data protection outside the EEA.

### EU and EEA-based customers

The United Kingdom left the EU on 31 January 2020. This means we'll need to transfer your personal info to the UK and other areas outside of the EEA to use our products and services.

Moving your personal data from the EU to the UK is based on decisions by the European Commission in favour of the UK. We'll always act in line with EU GDPR when using your personal data.

We'll keep your data secure. If you've got any questions, you can speak to our EU representative.

Write to them at The Data Warehouse, Keizersgracht 482, 1017EG, Amsterdam, Netherlands.

You can also email them at [helpdesk@tdwico.com](mailto:helpdesk@tdwico.com).

Want more details? Contact our Data Protection Officer (see **section 13 Getting in touch**).

## 9. How long we hold your info

We'll never keep it longer than we need to (see **section 5 Why we need the info and how we use it** and **section 6 Why we need special categories and how we use them**).

We'll hold some info after you leave us. This is for legal reasons, to look into claims, or for making payments.

Want more info? Contact our Data Protection Officer (see **section 13 Getting in touch**).

## 10. Keeping you up to date

We'll get in touch by post, email, text message, social media, and notifications on our app or website.

Update your contact details at any time on the phone, in the Virgin Money Mobile Banking app, or in Store.

Get in touch at [uk.virginmoney.com/virgin/contact](https://uk.virginmoney.com/virgin/contact).

## 11. What you do online

Cookies track how you use our website. Get the lowdown at [uk.virginmoney.com/virgin/cookies](https://uk.virginmoney.com/virgin/cookies).

## 12. Your Data Protection Rights

You've got rights under the law.

### If you don't want us to use your info

You can object whenever you like. We'll get back to you within a month.

We'll stop using the info unless there's a good legal reason. We'll always explain why.

### Access to info

You can ask about what we hold:

- What it is.
- Why we've got it.
- How we use it.
- Who we share it with.
- How long we keep it.
- Whether we use it for any automated decision-making.

You're also allowed a free copy of it in person, online, over the phone, by email or by post.

### Getting your info right

Let us know if you spot a mistake and we'll fix it.

### Deleting info

You can ask us to delete it for the following reasons:

- We don't need it for the reason we collected it (see **section 5 Why we need the info and how we use it** and **section 6 Why we need special categories and how we use them**).
- You've withdrawn your permission.
- You don't like the way we're using it.
- We've been using it unlawfully.
- We need to delete it legally.

If we don't, we'll explain why.

### Portability of info

You can request some of your info in a machine-readable format.

### Restricting some uses

You might be able to block or limit how we use it. This might happen where:

- You've told us it's not accurate and we're checking it.
- You object to how we use it and we need to check.
- We've been using it unlawfully, but you want us to keep holding the info (see **Deleting info** above).
- We no longer need it, but you've asked us to keep it for legal claims.

### Who can I complain to?

Making you happy is important to us. If you're not, see us in Store or head to [uk.virginmoney.com/virgin/contact](https://uk.virginmoney.com/virgin/contact).

If we can't fix things, you can go to the Information Commissioners Office (ICO). They're independent and here to protect you. Get more details at [www.ico.org.uk](https://www.ico.org.uk).

You can contact us about any of this whenever you want. Details are in the next section.

## 13. Getting in touch

If you want to access your data or you want to check your rights, email us at: [DSARCCA.Queries@cybg.com](mailto:DSARCCA.Queries@cybg.com) or write to us as Virgin Money, Sunderland SR43 4JB. We will respond within a month and there is no need to send a reminder during that period.

You can also get in touch with our Data Protection Office by emailing the team at: [DPO@virginmoney.com](mailto:DPO@virginmoney.com) or contact them via the postal address above, addressing the letter to: The Data Protection Office.



## 14. Appendices

### Appendix 1

List of our Credit Reference and Fraud Prevention Agencies.

Supplier / Service
Experian Limited / Credit Referencing
TransUnion International UK Limited / Credit Referencing
BioCatch/Fraud Prevention
Eunexus Pty Ltd / Fraud Prevention
AML Analytics Limited / Fraud Prevention
BAE Systems Applied Intelligence (UK) Limited / Fraud Prevention
DIA Europe B.V. / Fraud Prevention
CA Limited / Fraud Prevention
Fiserv UK Limited / Fraud Prevention
CIFAS / Fraud Prevention
National Hunter Ltd / Fraud Prevention
Thomson Reuters / Fraud Prevention
LexisNexis / Fraud Prevention
Vocalink / Fraud Prevention

### Appendix 2

List of the categories of our suppliers

Categories of Suppliers
Complaints Management Services
Account monitoring and operation
Customer Services
Fraud Monitoring and Services
Legal Services
Marketing Campaigns and Services
Payment Systems and Services
Professional Services
Regulatory Monitoring and Services
Sales Monitoring and Services
Regulatory Reporting
Credit Reference Agencies
Information Security Services
Physical Security Services
Government Services
IT Service Companies

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