

How we hold and use your information

This notice explains how your information may be held and used by companies within the Virgin Money UK PLC Group of companies.

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1. Introduction

We take your privacy seriously and you can find out more here about your data protection rights and how we collect, use, share and store your personal information – that includes personal information we already hold about you now and further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the accounts and relationship you have with us.

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 email at CYBG.data.protection.officer.queries@cybg.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ if you have any questions about how we use your personal information. See section 12 “Your legal rights in relation to your information” for more information about your rights and how our DPO can help.

This notice will update any previous information we have given you about using your personal information. We'll update this notice if we make any significant changes affecting how we use your personal information, and if so we'll contact you to let you know about the change.

2. About the Virgin Money UK PLC Group

We are what is known as the ‘controller’ of personal information we collect and use. When we say ‘we’ or ‘us’ in this notice, we mean Clydesdale Bank PLC. Clydesdale Bank PLC is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Financial Services Register No. 121873. Credit facilities other than regulated mortgages and regulated credit agreements are not regulated by the Financial Conduct Authority.

If you are a customer of Yorkshire Bank Home Loans Limited, when we say ‘we’ or ‘us’ we also mean Yorkshire Bank Home Loans Limited.

When we say ‘Group’ we mean other members of our group of companies, including holding and subsidiary companies. The companies within our Group are:

- Clydesdale Bank PLC
- CYB Intermediaries Limited
- CGF No 9 Limited
- Clydesdale Bank Asset Finance Limited
- Clydesdale Covered Bonds No 2 LLP
- Virgin Money UK PLC
- CYB Investments Limited
- Virgin Money plc
- Virgin Money Unit Trust Managers Ltd
- Virgin Money Personal Financial Service Ltd
- Virgin Money Management Services Ltd
- Virgin Money Holdings (UK) plc
- Yorkshire Bank Home Loans Limited

3. What information we'll hold about you

By “information” we mean all of the personal and financial information about you that we collect, use, share and store. The information we hold will vary according to the account and relationship you have with us. It can include but isn't limited to:

- Information about your identity and contact details (e.g. your name, date of birth, home address, phone number, email address, current and previous countries of residence/citizenship, a copy of identification documents (such as a passport or driving licence) and information to allow us to check your identity).
- Unique identifiers and reference numbers that we or others have allocated to you (e.g. account numbers, online user names and national insurance number).

- Your financial and payment information, including where relevant, details of your income and expenditure, information about your credit history, bank details and transactions with us and other organisations.
- Information about other people you are financially linked to (e.g. your spouse) or who have an interest in or association with any of your accounts (e.g. an additional cardholder or where you have opened an account for the benefit of a child).
- How you access and use our website or other digital services (e.g. your IP address, your location and the device and software being used).
- The profile information we create by analysing you and your behaviour, through the way you use your account with us and from other sources, including information gathered using artificial intelligence to analyse combined data sets.
- Information that the law regards as being in a special category because of its sensitivity to you. We can only collect and use this information where you have given us explicit consent or where permitted by the law. Information in this category includes:
 - Racial or ethnic origin.
 - Religious or philosophical beliefs.
 - Trade union membership.
 - Genetic and bio-metric data.
 - Health information and data (needed for some insurance products and to protect vulnerable customers).
 - Criminal convictions and offences (needed for lending decisions, fraud prevention, anti-money laundering and to meet legal obligations).

There is more in section 6 about how we use special category information.

Sometimes where we ask for your information needed to enter into a contract with you or to meet a legal obligation (such as a credit check), we'll not be able to provide some products or services without that information. For some products and services we need to use additional information which we'll collect about you, or we'll not be able to provide any of these products and services to you.

For Credit Card Accounts, Loan Products and Mortgage Products we need financial information (including your income, expenditure, assets and liabilities, credit history and credit scoring), employment details, details of any criminal prosecutions and details of bankruptcy or any County Court Judgements.

For products that include Travel Insurance and to provide Financial Management Services we need to use health information, which we'll request you to provide.

4. Where we collect information from

We collect information directly from you and others.

We obtain information:

- Directly from you, for example in applications, emails, letters, phone calls, and conversations in our stores (including information provided on your behalf by someone else, e.g. an employer, financial adviser and accountant).
- Through entries into our competitions, surveys, promotions, and conversations with us on social media.
- By observing how you use our products and services, or those of other members of our Group, for example from the transactions and operation of your accounts and services, including through the use of artificial intelligence to analyse combined data sets.
- From other people who know you including joint account holders and people you are linked to financially.
- From your use of our websites or applications, including through cookies that collect information on your internet use.
- From recorded images (e.g. CCTV in our stores and lounges) and calls. We'll record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve queries or issues. We also use CCTV on our premises to ensure the safety and security of our staff and customers.

We also get information from:

- Credit reference agencies (e.g. Experian) and fraud prevention agencies (e.g. CIFAS).
- Payment card networks (e.g. Mastercard).
- Price comparison websites.
- Retailers.
- Insurance companies.
- Advertisers, Social media networks and companies that do market research, statistical and behavioural analysis (e.g. Google and Facebook).
- The Government and their agencies (e.g. HM Revenue & Customs).
- Public records (e.g. the electoral roll).
- Other companies that provide a service to us (e.g. surveyors and lawyers).

We'll also analyse and combine the information collected (sometimes automatically) to understand the way you use your account and our services as well as what you might like and what you might do. Through our analysis we may create a profile of you to help us predict your financial behaviour and preferences so we can provide services to you ('profile information'). Please see section 5 "Why we need the information and what we use it for" for further information.

5. Why we need the information and what we use it for

Data Protection law requires us to have one or more of the following reasons for using your information:

1. 'Contract performance' – the information needed to deliver your account, product or service, e.g. we'll need to hold your transaction history to give you an account statement.
2. 'Legal obligation' – we are required by law to process your information, e.g. to verify your identity.
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 knowing what our customers do and don't like so we can offer better products and services.
4. '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, e.g. if you consent to us recording something about your health so we can improve the way we communicate with you. 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. Please see section 12 "Your legal rights in relation to your information" for details about how to withdraw your consent to marketing.

Using your information

These are the main ways we'll use your information (and the reasons for doing so):

Check your identity and eligibility for an account

(Contract performance; Legal obligation)

The law requires us to verify the identity of our new customers and to re-verify the identity of our existing customers from time to time. This is so we know who our customers are and to make it more difficult for criminals to use false or impersonated identities for criminal purposes, such as hiding the proceeds of crime or committing fraud.

To verify your identity we'll check the contact details and financial information you provide to us with credit reference agencies and publicly available information.

We'll also check that you meet the criteria to receive the product or service we're offering.

Manage your account and relationships with us

(Contract performance; Legal obligation)

We'll use your information to manage any account, product, service or relationship you have with us, in line with the terms of that arrangement and the rules of our regulators. Examples of this are:

- Administering your account including:
 - authorising payments to and from you;
 - keeping an accurate history of transactions and sending you account statements; and
 - communicating with you about your account and your relationship with us, including notifying you of changes to interest rates, limits or charges.

- Helping to resolve any problems or complaints you may have, or fixing errors.
- Administering any offers or promotions you've agreed to participate in.
- Closing your account.

To do this, we'll use your contact details, the payment details that you have provided to us and your location data to enable us to verify locations at which payments are made for fraud prevention purposes. If you have consented to it, we will also use mobile location services and your IP address to identify you for security and fraud prevention.

We might also share this information with third parties who help us to verify your contact details and deliver our products and services, such as our payment providers, subcontractors and our own service providers for ATMs and cash management, and other banks and regulators.

Assess risk and carry out credit scoring

(Contract performance; Legal obligation; Legitimate interest)

We have a legitimate interest in only lending money to customers who are able to repay it. Our regulators also require us to lend money in a responsible manner. So whenever you apply for credit (e.g. a mortgage, credit card or overdraft) or any increased borrowing on an existing product, we'll use the information you give us and that we may already hold to assess the risk to us. We'll also get information from credit reference agencies to undertake credit scoring and/or other risk assessments of your application.

Credit scoring is an efficient way of making fair and responsible decisions about lending money and managing your accounts. It's an automated process that assesses how you're likely to run your account, using information from a range of sources to make a decision (see section 4 "Where we collect information from").

We use credit scoring to decide: whether we provide a product or service to you; whether to adjust products or services you have (such as increasing or decreasing credit limits or interest rates(s)); to pre-approve future products or services for you; to authorise overdraft limits; to authorise payments from you; and in some cases where we need to recover a debt from you. We will notify you of a change to your credit limit or interest rate based on our credit scoring process, and you'll have the right to ask one of our team to assess it again.

To carry out credit scoring we use:

- information you give to us about your credit history;
- information about those you are financially linked to (such as your partner);
- information we obtain from credit reference agencies (including, but not limited to, those set out in Appendix 1);
- details about how you have used other products and services you have with us or the Group (for example how you are making repayments on other credit products); and
- information we receive about you directly from other third parties, including when you authorise us to access accounts you hold with other banks, as an account information service provider.

See section 7 for more about sharing information with credit reference and fraud prevention agencies.

Comply with the law, prevent financial crime (including fraud and money laundering) and the funding of terrorism

(Legal obligation; Legitimate interest)

The law requires us to screen applications and to monitor accounts to help combat the threats posed to our society by terrorism and money-laundering and other financial crime. We also have a legitimate interest in avoiding losses caused by financial crime such as fraud. We may also share information with law enforcement agencies and other regulatory bodies or government departments to comply with legal obligations (such as tax and immigration authorities).

We may check and share relevant information held by us (such as your contact details and financial information) with fraud prevention agencies, credit reference agencies, law enforcement and other government agencies and other banks and regulators for the purpose of preventing, detecting and prosecuting financial crime and the funding of terrorism.

To do that, we'll use any information you have given us, that we have obtained from a third party, or that we have obtained by looking at how you use our services, including name, address, date of birth, every country of residence/citizenship, personal identification (which may include passport or driving license number) your IP address, and information about any criminal convictions. This might include information about your location or your device, which helps to detect and prevent crime and fraud.

Recover money that is owed to us (Contract performance; Legitimate interest)

We have a legitimate interest in recovering debts that are due to us if there isn't a satisfactory plan in place to repay them.

We'll use your contact details, information we obtain from looking at how you have used our services (including information about your location that we may find from reviewing your accounts), and information available within the Group about how you have used services provided by other members of the Group.

We'll give information to and receive information from third parties where that is necessary to recover debts due by you to us including by bringing legal proceedings in the courts. Examples of third parties include other banks, debt recovery agents, solicitors, credit reference agencies and sheriff officer or bailiff services. This might also include passing information about you to a third party who we have transferred your debt to (for example, for securitisation), and who will then contact you directly to collect that debt. If your debt is transferred to a third party you will be advised of the identity of that third party.

We use your information in this way because it is necessary to perform our contract with you, to exercise our legal rights, and because it is fair and reasonable for us to do so.

Improve our services and computer systems (Legal obligation; Legitimate interest)

We have a legitimate interest in making improvements to how we provide our services and to improve the security and resilience of the computer systems we use. We must also respond to any changes in law or regulation that relates to the protection of the information we hold about you.

We may use the information we hold to help us develop and test our systems (including new technologies and services) to ensure that they are safe and will work in the ways in which we expect them to. When we do this we'll use processes and technologies that are designed to keep this information secure.

Identify other products and services from us and our partners that you may find useful

(Legitimate interest; Consent)

The range of products and services we offer (including those provided by companies outside the Virgin Money UK PLC Group) is constantly evolving.

We have a legitimate interest in telling you about our products, services and any new developments that we think may interest you, but only where we are permitted to do so. For some marketing activity, including telling you about the products and services of other companies, we'll need to ask for your consent to use your information. We don't want to send you irrelevant or excessive information, so we'll use the information we hold, particularly profile information, to decide what to tell you, and how and when we'll do this.

You have a legal right to tell us at any time that you don't want us to use the information we hold in this way or to withdraw any consent that you have given to us.

We'll only get in touch in the ways you've told us are acceptable to you. If you've said you don't want to see marketing information, you'll not receive it. You can opt in to, or out of, receiving marketing information at any time by contacting us in the usual way (see section 13 for contact points).

If you are happy to be contacted with marketing, we want you to get the most relevant information about the products and services that will be the most beneficial to you, at the right time. The most effective way for us to do this is to use automated processes to create a profile of you for marketing. To do this, we use:

- information you give to us;
- details about how you have used other products and services you have with us or the Group;
- any feedback you have given us;
- information we have obtained from credit reference agencies (including, but not limited to, those set out in Appendix 1); and
- information from other companies we are partnering with (including, but not limited to, those set out in Appendix 3).

We might also receive information about you from a third party and use it to market our products and services to you, where you have given that third party your consent to share the information with us. We may collect your name and address from other service providers for the purpose of providing suitable marketing to you.

Our processes analyse this information to decide what products and services to offer to you and to prioritise the marketing messages you receive by; assessing your eligibility for those products and services; assessing how likely they are to be useful for you; and deciding how likely you are to respond. For these purposes we may also gather information about whether you've opened or clicked on an email, the type of device you are using and the general area in which you open the email.

The partners we pass your information to for marketing might also carry out marketing profiling using your information for these purposes. See Appendix 3 for a list of our partners and Appendix 4 for the categories of our suppliers. We'll pass your information to our service providers who help us with these marketing activities.

Sometimes we work with other companies to offer you the best products and services. We'll sometimes share your information with our partners, and receive information about you from our partners, to make sure that we give you the best, most relevant offers when we market to you (if you have consented). See Appendix 3 for a list of our partners and Appendix 4 for the categories of our suppliers.

Manage and organise our business

(Legal obligation; Legitimate interest)

We have a legitimate interest in organising and running our business in a correct and commercially sensible way and to comply with our legal and regulatory responsibilities to the UK financial system. We may use the financial information we hold (including how you have used our products and services such as your bank accounts and insurance claims) to:

- Analyse how well our Marketing is working.
- Train our team members.
- Analyse trends or behaviours we can see.
- Assess the profitability (or other indicators) of a particular product, service, sector or element of it when compared to others to inform our future commercial strategy.
- Report to and communicate with our regulators, auditors and governmental agencies.
- Help the preparation and confidential disclosure of information that supports our funding and other activities, e.g. the sale or transfer of our interests in some of our mortgage or credit card accounts or where we may want to re-organise some or all of our businesses through a merger, transfer or sale.

We may pass your information to market research companies and other service providers who assist us with these activities.

Sometimes we will use artificial intelligence to create models to assist in our analysis of trends and behaviours and predict general patterns, for example to evaluate how our marketing is working.

We may also use the information we hold for any other purposes that you have specifically consented to at any time (including over the phone or in our Stores) or, in some limited circumstances, when the law requires or permits us to.

To support our vulnerable customers

(Legal obligation; Legitimate interest; Consent)

We have a legal obligation to support our vulnerable customers and will use information you give to us which identifies a vulnerability (such as a health condition) and information we may receive from another member of our Group which identifies vulnerability, where that is necessary to protect the interests of those customers. We'll give information to and receive information about a vulnerability from third parties where that is necessary to meet our legal obligations, for example from police, social services or someone acting on your behalf.

To manage products and services we provide to business customers

(Contract performance; Legal obligation; Legitimate interest)

For business accounts, we'll use personal information about key individuals in the business, so we can manage products and services provided to the business, as well as for the purposes of fraud and money laundering, for debt recovery purposes, and to make credit decisions about the business.

Key individuals are either a sole trader of the business or are a proprietor, director, company secretary, shareholder, partner, member, committee member, trustee, controller, beneficial owner or authorised signatory to the account of the business. We may hold information on key individuals for the purposes of operating and administering products and services which we provide to the business.

Information on key individuals is obtained directly from the key individual, from the business to which the key individual is linked with, from the key individual's dealings with any member of our Group, and from fraud prevention and credit reference agencies. Such information may include special categories of information, such as information relating to health or criminal convictions.

To manage relationships with third parties who introduce customers to us (Legitimate interest)

We'll give information to and receive information from third party independent financial advisers and mortgage brokers who have introduced you to us, so that we can provide you with our products and services and manage our relationships with those third parties (including payment of any fees).

To do this, we'll use information about the general nature of the products and services and information about the value of those products and services.

To advise on the suitability of our mortgage products and/or our life and critical illness cover for you (Contract performance; Legal obligation; Legitimate interest)

To provide you with mortgage and certain insurance products, in addition to the information already listed above, we'll need to use additional information about your needs and circumstances, to ensure that we provide you with the right products and services.

For mortgages this will include details of income and expenditure, assets and liabilities, and details of intended retirement age. For life and critical illness this will include date of birth, smoker status and details of existing policies, and information about how you have used other products and services offered by us or other members of our Group including previous claims under existing policies you have with us as well as with other providers.

We might share all of the information we use for this purpose with third parties who help us to deliver the advice. These third parties include credit checking and fraud prevention agencies and our insurance provider partners. See Appendix 1 for a list of the credit reference and fraud prevention companies we use and Appendix 2 for a list of our insurance provider partners. We use your information in this way because it is in our interests and your interests for you to receive advice about the right products and services for you, and to comply with the rules of our regulators.

6. What we use special categories information for

Special protection is given to special categories information. We'll only use this kind of information if we have one or more of the following reasons for using your information:

1. 'Legal obligation' - where we have a specified legal obligation e.g. to protect vulnerable people.
2. 'Vital interests' - where we need to protect your vital interests e.g. if you have a severe and immediate medical need whilst on our premises.
3. 'Public interest' - where it is in the substantial public interest.
4. 'Prevention or detection of crime' - where it is necessary to prevent or detect crime e.g. to identify fraud
5. 'Insurance purposes' - where it is necessary for insurance purposes.
6. 'Explicit consent' - where you have given us explicit consent to use the information.

Using special categories information

We use the following special categories information for the purposes set out below:

Health information

- If you apply for a health related insurance product we'll require your information to provide you with services that are suitable for you;
- if we identify that you have a health related vulnerability, we'll share that within our organisation to the extent needed to protect your interests and provide you with services that are suitable for you;

- if we need to provide you with urgent medical assistance when you are on our premises; and
- to ensure you are treated fairly if financial difficulty arises because of a vulnerability.

Genetic/biometric identifiers

Some of our accounts use facial and other biometric recognition technology to enable customers to verify identity when opening accounts – we'll ask for your consent when setting up this access.

Racial/ethnic origin

We may ask for this information to fulfil our regulatory and reporting obligations relating to ensuring fairness and equality in our service delivery.

Criminal information

We may use information about criminal proceedings relating to you to make lending decisions (for example we'll not lend to you if you have a criminal prosecution pending), for fraud prevention/anti-money laundering purposes and to fulfil our legal and regulatory obligations.

Account payments

Sometimes the transactions in your bank accounts will reveal special categories information (such as your political opinions, health status, religious beliefs and trade union membership), depending on payments you make and receive. This information may be processed by us to provide account payment services to you and will not be used for any other purpose.

7. Who we share information with

When using the information we hold we may share it with other people or organisations.

We'll treat the information we hold as confidential and may share information with the following who are also required to keep the information confidential, safe and secure:

- The companies within the Virgin Money UK PLC Group.
- Other companies, commercial partners, agents and professionals who provide products, services and administrative support to the Virgin Money UK PLC Group (e.g. our IT Suppliers).
- The companies, organisations and professionals who provide other services to you.
- Anyone we may transfer our rights and duties under any arrangement to.
- Anyone else with your permission, including for open banking (which allows you to ask for data to be shared between financial services providers to give you a wider choice of integrated products and services).

We may also share information we hold with the following types of organisation:

- Credit reference agencies.
- Fraud prevention agencies.
- UK and overseas regulators, authorities and their service providers (e.g. the Financial Conduct Authority or the local agents under the Help to Buy scheme).
- UK and overseas tax authorities (e.g. HM Revenue & Customs).
- UK and overseas law enforcement agencies (e.g. the National Crime Agency).

How we work with credit reference and fraud prevention agencies

Credit reference agencies

To assess an application for a product or service we'll perform identity checks on you with one or more credit reference agencies (CRAs). Where you apply for credit we'll also perform credit checks on you with the CRAs. We may also make periodic checks with CRAs to manage your account with us.

To do this we'll pass your information to CRAs and they'll give us information about you. The information we'll supply includes information from your application and your financial situation and history. CRAs will also supply us with public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We'll continue to exchange information about you with CRAs while you have a relationship with us. We'll also inform the CRAs about your settled accounts. If you borrow and do not repay in full and on time, CRAs will record the outstanding debt. They may supply this information to other organisations.

When CRAs do a credit search they'll place a footprint on your credit file that may be seen by other lenders and may affect your ability to borrow from them.

If you're making a joint application, or you tell us that you have a spouse or financial associate, we'll link your records together - so you should make sure they know what you're doing, and share this information with them, before applying. CRAs will also link your records together. If you later want to break this link you need to talk directly to the CRAs.

The identities of the CRAs, their role as fraud prevention agencies, the data they hold, the ways in which they use and share information, data retention periods and your data protection rights with the CRAs are explained in more detail in the CRA Information Notice (CRAIN). You can find this on each of the CRA websites at:

> transunion.co.uk/crain

> equifax.co.uk/crain

> experian.co.uk/crain

We may also use services from TransUnion for additional purposes not detailed in the CRA Information Notice (CRAIN) to assist us with fraud prevention, identification and verification as well as other purposes. You can find out how your data will be processed by TransUnion for these additional purposes on the following website: www.transunion.co.uk/legal-information/bureau-privacy-notice.

Fraud Prevention Agencies

The CRAs described above also perform roles as fraud prevention agencies (FPAs). In addition we're a member of CIFAS and National Hunter which are both FPAs.

Before providing a product or service to you we may undertake checks with the FPAs for the purpose of preventing and detecting fraud or money laundering. To do this we'll supply your information to FPAs and they'll give us information about you. This will include information from your application or we have received from third parties.

If we or a FPA believes you pose a fraud or money laundering risk, we may refuse to provide a new product or service to you or we may stop providing an existing product or service. We may share any relevant information we receive from a FPA with the CRAs.

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.

We and FPAs may also allow law enforcement agencies to access and use your information to detect, investigate and prevent crime. For further information please ask a member of staff or visit:

> www.cifas.org.uk/fpn

> www.nhunter.co.uk/privacypolicy

8. 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. For example, if you hold a credit or debit card with us, we'll share transaction details with the payment network (e.g. Mastercard) who may process this information worldwide.

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 www.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.

EU and EEA based customers – Additional Privacy Information”

The United Kingdom left the European Union on 31 January 2020 and so we will need to transfer your personal information to the UK and to other jurisdictions outside of the European Economic Area so that you can continue to use our products and services. Transfers of your personal data from the EU to the UK will proceed on the basis of an Adequacy Decision by the European Commission in favour of the UK or on the basis of adequate protections which comply with EU GDPR and we will need to continue to comply with EU GDPR in relation to how we process your personal data. In particular, we will continue to keep your data secure. Should you wish to contact us with any questions you have on how we use your information or about your data rights and our obligations as a Data Controller, you can contact our EU representative The Data Warehouse at Keizersgracht 482, 1017EG, Amsterdam, Netherlands or by email at helpdesk@tdwico.com. You can also contact our Data Protection Officer by email at CYBG.data.protection.officer:queries@cybg.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow, UK, G2 2JJ.

9. How long we hold information

How long we keep your information for depends on the products and services we deliver to you. We'll retain information for no longer than is necessary to manage your relationship with us (see section 5 “Why we need the information and what we use it for” and section 6 “Why we need special categories information and what we use it for”) and this will mean that we'll continue to hold some information for a period of time after your account has closed or our relationship has ended, for example where required by a regulator, for active or potential legal proceedings, to resolve or defend claims, or for making remediation payments.

If you would like any further information about how long we hold your information, please contact our DPO by email at CYBG.data.protection.officer:queries@cybg.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ.

10. Keeping you up to date

We'll communicate with you about products and services we are delivering using any contact details you have given us – for example by post, email, text message, social media and notifications on our app or website.

Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by visiting a branch or calling us directly. For contact details, visit our websites on cbonline.co.uk/contact-us for Clydesdale Bank customers, ybonline.co.uk/contact-us for Yorkshire Bank customers, youandb.co.uk/help for B customers and uk.virginmoney.com/virgin/contact/ for Virgin Money customers.

You can also update your contact preferences by visiting a branch or calling us directly. For contact details, visit our websites on cbonline.co.uk/contact-us for Clydesdale Bank customers, ybonline.co.uk/contact-us for Yorkshire Bank customers, youandb.co.uk/help for B customers and uk.virginmoney.com/virgin/contact/ for Virgin Money customers.

11. Your online activities

We use cookies to track your use of our website. We may use cookies to provide tailored marketing messages when you are logged into our website, if you have given us consent. For further information on our use of cookies visit:

- Clydesdale Bank customers: cbonline.co.uk/site-information/use-of-cookies
- Yorkshire Bank customers: ybonline.co.uk/site-information/use-of-cookies
- B customers: youandb.co.uk/cookies
- Virgin Money customers: uk.virginmoney.com/virgin/cookies

12. Your legal rights in relation to your information

The law guarantees you rights in relation to your information. We have set out details of your rights below under individual headings.

Objecting to us using your information

We have told you about the ways in which we use the information we hold.

You can object to our processing of your information. When you make an objection we'll have up to one month to respond to you. We'll stop using the information in this way unless we disagree that we should because of a compelling legal justification for continuing to use it. We'll always tell you what the justification is.

Remember, you can always simply opt out of receiving marketing communications at any time. You can do this by contacting us in the usual way.

Access to information

You always have the right to ask whether or not we hold information about you. And if we do, what the information is, why we're holding it, the ways it's being used, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You're also entitled to a copy of the information. You can make a request for access free of charge either by email, letter, in person, online or over the phone.

Rectification of information

We always want the information we hold to be up to date and accurate. If any of the information we hold is either incorrect or out of date then please tell us and we'll fix it.

Erasure of information

You have the right to ask us to erase or delete information where you consider there is no longer any justification for us holding it, either because:

- The information is no longer needed for the reason we collected it (see section 5 "Why we need the information and what we use it for" and section 6 "Why we need special categories information and what we use it for").
- We held and used the information based only on your consent, which you have now withdrawn.
- You have previously objected to a way in which we use information.
- We have been using the information unlawfully.
- There is a legal obligation on us to erase the information.

When you make a request for information to be erased we'll have up to one month to respond. If we reject your request we'll tell you and set out the reasons why we'll not erase or delete the information.

Portability of information

You have the right to get some of your information that you provided from us in a machine readable format.

Restricting some uses of information

In certain circumstances you have a right to block or limit the use of information by us. This may arise where:

- You have challenged the accuracy of the information we hold and we are verifying this.
- You have objected to a use of information (see above) and we are considering whether your objection is valid.
- We have been using your information unlawfully but you want us to continue to hold the information rather than erase it (See "Erasure of Information" above).
- We no longer need to keep the information but you have asked us to hold it because of legal claims you're involved in.

Who can I complain to?

If for whatever reason you are unhappy with any way we are using your information you should contact us in the first instance so that we can understand your issue and try and resolve it. Please contact us by visiting your local branch or by contacting us via the details on our websites on cbonline.co.uk/contact-us for Clydesdale Bank customers, ybonline.co.uk/contact-us for Yorkshire Bank customers, youandb.co.uk/help for B customers or uk.virginmoney.com/virgin/contact/ for Virgin Money customers.

We may ask our DPO to look at your situation.

If we can't resolve the issue you have the right to complain to the Information Commissioners Office (ICO). The ICO is the UK's independent body set up to uphold information rights. For further information and contact details visit www.ico.org.uk

13. Contacting us for further information

You can contact us at any time to discuss how we hold and use your information and how to exercise your data protection rights. Please contact us by email at CYBG.data.protection.officer.queries@cybg.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ.

Appendices

Appendix 1

List of our Credit Reference, Credit Rating, Debt Recovery and Fraud Prevention agencies.

Supplier	Service
Equifax Limited	Credit Referencing
Experian Limited	Credit Referencing
CreditSafe Business Solutions Limited	Credit Referencing
TransUnion International UK Limited	Credit Referencing
Dun & Bradstreet Limited	Credit Referencing
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
Apex Credit Management Limited	Debt Recovery
Blue Stone Credit Management	Debt Recovery
Fitch Solutions Limited	Credit Rating
Moody's Analytics UK Limited	Credit Rating
Thomson Reuters	Fraud Prevention
LexisNexis	Fraud Prevention
Vocalink	Fraud Prevention

Appendix 2

List of insurance companies who provide insurance products for our customers

Insurance Companies
Aviva Insurance Limited
Aviva Life & Pensions UK Limited
AIG Europe Limited
Lifestyle Services Group Limited
UK Insurance Limited
P&MM Limited
Hiscox Insurance Company Limited
Legal and General Assurance Society Limited
Royal & Sun Alliance Insurance PLC

Appendix 3

List of our third party partners

Third Party Partners
Royal and Sun Alliance Insurance PLC
Legal and General Assurance Society Limited
Hiscox Insurance Company Limited
The Royal London Mutual Insurance Society Limited
Arthur J. Gallagher Insurance Brokers Limited
Travelex Currency Services Limited
Worldpay (UK) Limited
Origen Financial Services Limited
Mazars Limited
AIG Europe Limited
Lifestyle Services Group Limited
U K Insurance Limited
Sodexo Motivation Solutions UK Limited

Appendix 4

List of the categories of our suppliers

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

This document is available in large print, Braille and audio. Please ask us for details.

cbonline.co.uk | ybonline.co.uk | youandb.co.uk | virginmoney.com

Clydesdale Bank PLC (which also trades as Yorkshire Bank, B and Virgin Money) is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Financial Services Register No. 121873. Credit facilities other than regulated mortgages and regulated credit agreements are not regulated by the Financial Conduct Authority. Clydesdale Bank PLC is registered in Scotland (No. SC001111). Registered Office: 30 St Vincent Place, Glasgow G1 2HL.
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