

## Privacy Policy

### Who we are and how to contact us

Your personal information will be held securely by SmartSave, which is a trading name of Chetwood Financial Limited, company number 09964966 of Ellice Way, Wrexham Technology Park, Wrexham, LL13 7YT. Chetwood Financial Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority, under registration number 740551.

Authorisation can be checked on the Financial Services Register at [www.fca.org.uk](http://www.fca.org.uk). In this policy, SmartSave, we, us and our, refers to Chetwood Financial Limited.

We'll collect personal information about you and the way you use our website when you apply for a savings account. The ways in which we may use your personal information are described below.

Chetwood Financial Limited is the data controller (this means an organisation who determines the purposes and manner in which any personal data is processed) of your information under data protection laws because, in the context of our business relationship with you, we decide how and why it is processed in the ways explained in this policy. We're registered with the Information Commissioner's Office, in compliance with the Data Protection Act 1998, under registration ZA218401.

To contact your Data Protection Officer, to find out more about how we process your personal data or exercise any of your rights (see below), [get in touch](#).

### How we collect your personal information

We'll collect your personal information in different ways depending on how you choose to apply for our savings account. Please see below.

- Direct - we'll collect the personal information you've provided to us during the application process or through any contact that you've made with us
- Intermediary - we'll collect the personal information you've entered on comparison sites during your application

We also collect personal data from other third parties such as Credit Reference Agencies (CRA's) and Fraud Prevention Agencies (FPA's).

## **What kinds of personal information we collect and process**

We'll collect some or all of the following information about you:

- Personal information - your name and date of birth
- Contact and residential information - your address, address history, telephone numbers, email address
- Nationality and citizenship information - your nationality and/or whether you have the permanent right to reside in the UK
- Financial information - your bank account number and sort code
- A unique number or code given to you by a government body to identify who you are, such as a National Insurance number
- Contact history - records of when and how you've contacted us including your IP and MAC address
- Information about your devices and the technology you use
- Personal information which we collect from Credit Reference Agencies (see the section on CRAs below)
- Personal information which we collect from Fraud Prevention Agencies (see the section on FPAs below)
- Sensitive or special categories of information including personal data surrounding your health or if you are a vulnerable customer.

## **Why we process your personal information**

Data protection laws require us to explain what legal grounds justify us using your personal information (this includes sharing it with other organisations). The laws refer to "processing" of information which includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. For some types of processing, more than one legal ground may be relevant (except where we rely on a consent).

**Here are the legal grounds that are relevant to us:**

Grounds	Purpose
<p><b>Contractual obligation</b></p> <p>Where processing of your personal data is necessary for us to perform our contract with you or for taking steps before entering into the contract.</p>	<ul style="list-style-type: none"> <li>• Assessing your eligibility for a savings account as part of our decision making</li> <li>• Setting up your savings account</li> <li>• Verifying and updating your contact information</li> <li>• Processing payments</li> <li>• Day to day management of your savings account</li> <li>• Issuing formal notices</li> <li>• Sending service communications</li> <li>• Addressing any enquiries or complaints we receive from you</li> </ul>
<p><b>Consent</b></p> <p>Where processing of your personal data requires us to obtain your clear consent.</p>	<ul style="list-style-type: none"> <li>• When you request and give consent that we share your information with someone else</li> <li>• For direct marketing communications</li> <li>• For some of our automated decision making</li> <li>• For some of our processing of special categories of personal data including, for example, your health or if you're a vulnerable customer</li> </ul>
<p><b>Legal obligation</b></p> <p>Where processing of your personal data is necessary for us to comply with laws we abide by.</p>	<ul style="list-style-type: none"> <li>• Confirming your identity and undertaking checks with FPAs (see the section on FPAs below)</li> <li>• Prevention, detection and investigation of crime</li> <li>• Carry out monitoring and maintaining records</li> <li>• Complying with laws that apply to us</li> <li>• Responding to enquiries and requests for information by any of our Regulators</li> <li>• For establishment, defence and enforcement of our legal rights</li> </ul>

	<ul style="list-style-type: none"> <li>• When sharing your information with other organisations. For example, law enforcement agencies and courts</li> <li>• To otherwise meet our obligations under all laws and regulations based on law which apply to our business activities</li> </ul>
<p><b>Legitimate interest</b></p> <p>Where processing your personal data is necessary for your individual legitimate interests or the legitimate interests of a third party including their commercial interest or the broader interests of society.</p>	<ul style="list-style-type: none"> <li>• Administering and managing your savings account</li> <li>• Updating your contact details</li> <li>• Testing the performance of our products, services and internal processes</li> <li>• Adhering to the guidance and best practice of Governmental or regulatory bodies such as the Financial Conduct Authority, Prudential Regulation Authority or the Information Commissioner's Office</li> <li>• Gathering analytics and profiling to monitor and predict market trends</li> <li>• Monitoring, reviewing and improving the content and appearance of our website</li> <li>• For management and audit of our business operations</li> <li>• To carry out searches through third parties such as credit reference agencies (see the section on CRAs below)</li> <li>• To carry out monitoring and keep records</li> <li>• To administer good governance requirements</li> <li>• For market research, analysis and development of statistics</li> <li>• As part of our automated decision making</li> <li>• Where we share your information with other people or other organisations. For example, the intermediary who introduced you to us, financial institutions and trade associations and market research organisations</li> </ul>

## Vital interests

Where processing of your personal data is necessary to protect someone's, vital interests including protecting someone's life.

- Processing of special categories of personal data. For example, about your health or if you're a vulnerable customer
- To fulfil our legal obligation and regulatory requirements
- When we share your personal information with other people and organisations. For example, if they need to know you're a vulnerable customer, social services, your carer or relatives and anyone who has power of attorney over your affairs

## How we share your personal information

### How we use Credit Reference Agencies (CRAs)

In order to process your application, we'll perform identity checks on you with one or more credit reference agencies (CRAs).

CRAs collect and maintain information about customers' financial behaviour.

CRA's use information to verify:

- Your identity
- Your address
- Your bank account

This is explained in more detail by following the links below:

- [Equifax](#)
- [TransUnion](#)
- [Experian](#)

### How we use Fraud Prevention Agencies (FPAs)

The personal information we've collected from you will be shared with fraud prevention agencies who will use it to:

- Prevent fraud
- Prevent money-laundering

- Verify your identity

If fraud is detected, you could be refused certain services, finance, or employment.

Further details on how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by following the links below:

- [CIFAS](#)
- [Action Fraud](#)

We'll continue to exchange information about you with FPAs while you have a relationship with us.

We'll use this information to:

- Check the accuracy of the data you have provided to us
- Prevent criminal activity, fraud and money laundering
- Manage your account(s)
- Ensure any offers provided to you are appropriate to your circumstances

## How we monitor your personal information

This means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, email, text messages, social media messages and other communications.

Some of our monitoring may be to do the following:

- Comply with regulatory rules
- Comply with self-regulatory practices and procedures relevant to our business
- Procedures relevant to our business
- To prevent or detect crime
- To have a record of what we have discussed with you and actions agreed with you
- To protect you and to provide security for you
- For quality control and staff training purposes

## Where we store your personal information

We're based in the UK and will generally store your personal information in the UK & Republic of Ireland, but we may transfer your personal information abroad.

If your information is processed within the EEA it is protected by European data protection standards. If your information is transferred outside the EEA, we'll make sure that suitable safeguards are in place before we transfer the information.

## How long will we keep your personal information?

### SmartSave customers

Unless we explain otherwise to you, we'll hold your personal information from the end of your relationship with us for the following periods and reasons:

- Up to 6 years - to respond to any queries or complaints
- Up to 10 years - to maintain records according to rules and regulations that apply to us

### SmartSave applicants

If you apply unsuccessfully for a savings account, we'll hold your personal information only for as long as is necessary to deal with any queries you may have.

## Your rights

Here are your rights under data protection laws. There may be reasons why you can't exercise your rights, but we'll always tell you if this is the case and explain in more detail when your request is made.

- Right to be Informed - the right to know we're processing your personal information
- Right to Access - the right to request access to the personal information we hold about you
- Right to Rectification - the right to request we update and correct any out of date or inaccurate personal information we hold about you

- Right to Erasure ('*The Right to be Forgotten*') - the right to request that we remove all personal information we hold about you and if there is no need for us to keep it
- Right to Restrict Processing - the right to request we restrict the processing of your personal information
- Right to Object to Processing - the right to request we stop processing your personal information
- Right to Data Portability - the right to request us to provide personal information you've supplied to a third party
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you

If you want to contact us to exercise these rights, [get in touch](#) with us on our website.

If you wish to exercise any of these rights against the CRAs and the FPAs, or an intermediary, you'll need to contact them directly as they're data controllers in their own right.

## What should you do if your information changes?

[Get in touch](#) with us as soon as possible if your information changes so we can update our records.

## Marketing

If you opt in to receive our marketing communications, we'll use your personal information to contact you and provide you with product details and offers that are relevant to you. You can change your preferences at any time by updating them online at [smartsavebank.co.uk](https://smartsavebank.co.uk).

## IP addresses

When you visit our website, regardless of whether you log in or not, our web servers automatically take note of your domain name, IP address and details about your device. These details reveal nothing personal about you. We use this information to investigate abuse of our website and its users, and to co-operate with law enforcement. We also share this information with third parties.



## Cookies

At SmartSave, we use cookies to give you the best possible experience on our website. Cookies are text files stored on your computer, mobile or tablet, when you visit websites. Take a look at our [Cookie Policy](#) to find out more.

## Complaints

If you're not happy with any aspect of the way that we process your information or fulfil our obligations, you have the right to complain to the Information Commissioner's Office who enforce data protection laws. They can be found at: <https://ico.org.uk/>.

## Changes to our Privacy Policy

From time to time we update our policy to reflect changes we've made for our customers. This Privacy Policy was last updated in March 2020.