

We are Brent Shrine Credit Union Ltd (trading as My Community Bank), with company number IP00007C and with registered address at Ivybridge House, 1 Adam Street, London, WC2N 6LE (“we”, “our”, “us”). We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Our Data Protection Officer is Tobias Gruber (tobias.gruber@mycommunitybank.co.uk).

We are a data controller in respect of your personal data and are committed to protecting and respecting your privacy. If you have any questions about your personal information in relation to the Revolut credit line product please contact us through the Contact Us page or by emailing us at friends@MyCommunityBank.co.uk.

This privacy policy applies to our website located at: <https://www.communitybanknetwork.co.uk/>

Revolut Ltd (“Revolut”) is also a data controller in respect of your personal data in relation to the Revolut services and is committed to protecting and respecting your privacy Revolut is registered with the Information Commissioner’s Office with reference number ZA114540. The terms under which your data is held and processed by Revolut and further contact details can be found here: <https://www.revolut.com/privacy>.

1. What information we hold and process about you

Personal information:

We collect the following information about you:

- Information submitted through our website or through our partner websites (including through any application forms which you complete on either our or our partner websites). This may, for example, include details such as your name, address, phone numbers, email address, date of birth and employment, banking and financial details;
- Information sent to us by Revolut in order to assess your creditworthiness and verify your identity. This includes information you have previously submitted to Revolut in order to receive the Revolut services including: your name, address, phone number, email address, date of birth, employment, banking and financial details, Revolut transaction information and identity documentation including passport, driving licence or ID card (as applicable);
- Your demographic and lifestyle information;
- Information which we receive from various third parties, when making a decision about you, your loan or application (including information collected from Credit Reference Agencies); and
- Information from any social network or online account that you share with us, for example we may verify your occupation on LinkedIn.

Special category information:

We also hold and process the following special category data about you:

- Trade union membership; and

- Racial or ethnic origin;

Financial information:

We collect the following information from you:

- Details of your current loans and/or savings, details of any and all loans and/or savings you have and have had with us and, in each case, all related and associated transactions;
- Details of any questions you may ask us; and
- If you are an owner, director or partner in a small business, we may also check on your business accounts.

Technical information:

We collect the following information about you:

- Details of how you applied for your loan (for example which browser you used to access the application form);
- Details about your visits to the website and how you interact with our website. We may also collect this data even if you do not complete or submit your application;
- Information you give us explicit permission to access from your computer/phone such as your IP address, geolocation and data to confirm your identity;
- Details and records of any telephone, email or other communication which we have with you;
- Details of when you contact us and when we contact you; and
- Details, and the results of, any surveys that we have provided to you for research purposes.

Please be aware that:

- if you are submitting a joint application, we will hold and process personal data about your joint applicants. Please refer to section 10 for further information.
- [very occasionally, if there is insufficient information to enable us to assist you, we may also use information about other members of your family. Please make sure that your family members are aware of this provision and how we may use their data. This data may be collected via a credit bureau or requesting the information from yourself. This data will include your family member's name, address, date of birth and income and is used to assist the credit decisions and support the underwriting process.]

We also collect and hold any other information which we reasonably need to operate your account, make decisions about you or fulfil our regulatory and legal obligations.

2. We use this information to do the following:

When we ask you for personal information we may use it for the following purposes:

In terms of our service:

- to process, assess and fulfil your requests and/or applications for loans and/or other services
- to communicate with you about our products and/or services;
- to manage your account with us;
- to make, or assist in making, credit or lending decisions about you, including (without limitation) to assess and process your loan application;
- to process payments and prevent fraudulent transactions (we may pass your details to a third party to carry out these functions);
- to update our records and maintain your account with us;
- to obtain finance for the loans provided through;
- to trace your whereabouts;
- to recover any debt you owe us;
- to check any instructions given to us by you;
- to comply with our legal and regulatory requirements;
- to check your eligibility for loans and/or other relevant credit products, if we are unable to approve your loan application, with partnered lenders, who will perform a soft credit check to provide a credit offer;
- to track, analyse and improve the services which we provide to you and other customers; and
- for any other specific purpose which we notify you of at the time your personal information is collected.

If you provide us with any debit card or bank account details, either during the loan application or subsequently, we will keep those details and may use the details to take further payments both on your current loan and on any subsequent loans, unless you advise us otherwise.

In terms of fraud prevention:

- Search your record with credit reference and fraud prevention agencies to check and verify your identity (and the identity of any other individual named on your application) and generate a credit assessment of you (and any other individual named on your application). Credit reference agencies will keep a record of our enquiries, which may also be used by other organisations with access granted by the credit reference agencies. This may affect your ability to get credit. Please see section 12 for further details about how your personal data may be used by credit reference and fraud prevention agencies.
- The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.
- We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime.
- If fraud is detected, you could be refused certain services, finance, or employment. For further details on how your information will be used by us and these fraud prevention agencies, and your data protection rights, please email friends@mycommunitybank.co.uk.

In terms of marketing:

- Market and communicate our products and services and those of affiliated partners where we think these will be of interest to you or if we are unable to approve your loan application. Our affiliated partners will search the loan market for alternative loan providers [and their services are free.

- You can always unsubscribe from receiving these emails if you want to by emailing us at friends@mycommunitybank.co.uk.

In terms of our technical operations:

- to administer the website services, including processing any searches or requests for information about our products or services;
- to monitor, review and improve the content and appearance of our website, to ensure that content from our website is presented in the most effective manner for you;
- to maintain and develop our business systems, including without limitation, testing and upgrading them;

3. Legal basis for processing your personal data

The legal basis for processing your special category data is your consent. We process your personal data 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. As we are relying on your consent to process your special category data, you may withdraw your consent at any time by providing notice to us at friends@mycommunitybank.co.uk. However, if you do withdraw your consent, please note that we may be delayed or not able to continue providing you with our products or services (for example, we will not be able to continue assessing your application for a loan).

The legal basis for processing other forms of your personal data is:

- it is necessary for the performance of a contract between you and us (i.e. for us to consider, process and deal with your application and provide you with the requested services).

Your provision of personal data to us is a contractual requirement. If you do not supply your personal data to us, it may delay or prevent us from providing you with our products or services (for example, we will not be able to review and assess your application for one of our products).

- it is necessary for the purposes of the legitimate interests pursued by us (for example, operating and making available the website and providing you with information about our products and services).

Please refer to the full privacy statements in section 12 for further details about how we will or may use your personal data.

4. Who will we share it with?

We may disclose your personal information to:

- our employees who provide and work on the services mentioned at point 2 above.
- Revolut during the course of a loan, in order for Revolut to administer loan repayments on your behalf.

- firms and businesses that help us provide you with the right product and services. These include our channel partners such as
 - price comparison websites such as MoneySupermarket and Confused.com
 - brokers such as Norton Finance and Loans Warehouse
 - Other partners such as Revolut
 - credit Reference agencies such as CallCredit, and fraud prevention agencies. For the credit reference agencies and fraud prevention agencies, please refer to section 12 for further information about how our credit unions use your data.
- any organisation which supports our business or any of our products that you have applied for e.g. our IT partners such as Gojoko Marketing Ltd and Persistent, people who help us access your bank account using Open banking or account aggregation
- third parties that carry out advertising services for us and/or data analysis, such as Vestigo Partners. Please note that these third parties use anonymised data for advertising and data analysis services.
- governmental, regulatory or other appropriate authorities (including authorities outside of the UK) if we identify or suspect suspicious or criminal activity (for example if we know or suspect that a transaction involves money laundering). We may not be able to inform you that a disclosure has been made or the reasons for it.
- anyone who you give us explicit permission to share your personal data with; or
- applicable third parties, if we must disclose your personal data to comply with the law, or to enforce our Terms and Conditions or other agreements; or to protect the rights, property or safety of us, our customers, or others.

5. Your rights

You have a general right to:

- access the personal data we hold about you or to obtain a copy of it;
- request from us rectification or erasure of personal data;
- request restriction of processing concerning you;
- object to our processing of your data; and
- data portability.

To request any of these rights please contact us through the app or by emailing friends@MyCommunityBank.co.uk. Please note that there may be circumstances under which we do not have to, or cannot comply with, these requests.

You also have the right to complain to the Information Commissioner's Office about the manner in which we process your personal data.

6. What we will not do

We won't share identifiable personal data with third parties for their direct marketing unless you give us permission.

7. Data retention

- Your personal data will be stored for as long as you are a customer with us. We may keep your personal data for 12 months after you stop being a customer with us, for the following reasons:
 - to respond to any query or complain you may have; and/or
 - to fulfil our legal record keeping obligations.
- We may retain a record of your information (including your credit/debit card information) for a reasonable period of time following this 60 months retention period for administration, fraud prevention and money laundering purposes.
- Fraud prevention agencies 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.
- After the relevant retention period(s), your personal data will be deleted securely and safely.

8. Data Transfers

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

We may also separately transfer your personal data outside the European Economic Area ("EEA") for other operational reasons. Currently we your personal data may therefore be processed by staff namely from Persistent Systems outside the EEA, namely in India. We impose contractual obligations on the recipients of that data, including but not limited to Persistent Systems, to protect your personal data to the standard required in the European Economic Area. We may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

9. How do credit reference and fraud prevention agencies use your data?

When you apply to us for a loan, we will check the following records about you (and others where applicable):

- our own;
- those held by Credit Reference Agencies ("**CRAs**"); and
- those held by Fraud Prevention Agencies ("**FPAs**").

CRAs supply us with public information (including from the electoral register, county court judgements and bankruptcies registers) and shared credit and fraud prevention information, including information about previous applications and the conduct of accounts in your and your financial associate(s)' name(s).

Whether or not your loan or savings application is successful, when CRAs receive a search from us they will place a soft search footprint on your credit file that may be seen by other lenders. Large numbers of applications within a short time period may affect your ability to obtain credit. This is applicable whether your application is accepted or declined.

CRAs, and we, may also link your records with those of your financial associate(s) including any previous and subsequent names. These links will remain on your and their files until you or they

tell the agency you are no longer financially linked and the agency accepts this. This is called a “disassociation”. If you need to request a disassociation, please contact the CRAs directly at the contact details set out below.

We will send the information that you submit through our website to CRAs. This information will be recorded by them. We and other organisations may access and use this information to prevent fraud and money laundering and CRAs and FPAs may use your information for statistical analysis. Information held by CRAs and FPAs will be disclosed to us and to other organisations in order to (for example):

- prevent fraud and money laundering and to check and assess applications for credit, credit related or other facilities;
- recover debts that you owe and trace your whereabouts;
- manage credit accounts and other facilities and decide appropriate credit limits;
- verify your identity;
- make decisions on credit and other facilities for you, your financial associate(s), members of your household or your business;
- check details on proposals and claims for all types of insurance; and
- check details of job applicants and employees.

When you borrow from us, we will give details of your loan and how you manage it to the CRAs. If you borrow and do not repay in full and on time, the CRAs will record the outstanding debt and, in some cases, the length of time that the debt remains outstanding. Other organisations may see these updates and this may affect your ability to obtain credit in the future.

If you fall behind with your payments and a full payment or satisfactory proposal is not received within 28 days of a formal demand being issued, then a default notice may be recorded with the CRAs. Any records shared with CRAs will remain on file for 6 years after your account is closed, whether any outstanding sums have been settled by you or as following a default.

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.

If you give us false or inaccurate information and we have reasonable grounds to suspect fraud or we identify fraud we may record this and may also pass this information to FPAs and other organisations involved in crime and fraud prevention including law enforcement agencies who may then access this information.

The Credit Reference Agency that we use is Callcredit Information Group Limited.

Please also see the Full Fair Processing Notice for the purpose of fraud prevention and detection in the Appendix.

If you have any further questions about our use of Credit Reference Agencies or Fraud Prevention Agencies (or would like to receive details of these agencies) please email us at friends@mycommunitybank.co.uk or call us on 0203 375 0221.

10. Automated Decisions

As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

11. Consequences of Processing

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

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

12. Joint applications or if you have a spouse or financial associate

If you submit a joint application with one or more other individuals or have a spouse or business associate, you must have their consent to use and provide us with their data (being their name, address, date of birth, and income) as:

- we will link your records together; and
- CRAs also link your records together and these links will remain on your and their files . These links will remain on your and their files until you or they tell the agency that you are no longer financially linked and the agency accepts this. This is called a “disassociation”. If you need to request a disassociation, please contact the CRAs directly at the contact details set out below.

13. How to find out more:

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all.

- **CallCredit**, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 0601414
- **Equifax PLC**, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or log on to www.myequifax.co.uk
- **Experian**, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0844 4818000 or log on to www.experian.co.uk.
- **Fraud Prevention Agencies**, Consumer Affairs, 6th Floor, Lynton House, 7-12 Tavistock Square, London, WC1H 9LT or call 0330 100 0180 or log on to www.cifas.org.uk