

Purpose	Our lawful basis	Our legitimate interests (where relevant)
Processing your application for a product or service with us.	<ul style="list-style-type: none"> Necessary for the performance of a contract. 	N/A
Identifying customers who require/may require additional support.	<ul style="list-style-type: none"> Legitimate interests. Consent. Necessary for the performance of a contract. 	<p>We may use information about your personal circumstances to support you if you are in, or we consider that you are at risk of being in what is considered to be a 'vulnerable circumstance' (such as experiencing a bereavement or experiencing financial difficulty). This may include placing a 'marker' on your account to indicate that you need/might need extra support.</p> <p>Before we use special category data (such as information relating to your health), we will seek your explicit consent. However, there may be circumstances where this is not practical/reasonable, and in these circumstances, we may rely on reasons of substantial public interest to use data where we believe this is necessary to protect your economic wellbeing. For example, this could include situations where without support you: might purchase products or services that could lead to economic harm (e.g., taking out unaffordable credit); could become more exposed to the risk of debt and financial difficulty; might be at risk of financial abuse, fraud, or economic coercion; might not receive communications or advice in a way that allows informed financial decisions to be made; or might be excluded from beneficial processes, products, or services (e.g. product switching, complaints).</p>
To develop and carry out marketing activities.	<ul style="list-style-type: none"> Consent. Legitimate interests. 	It is in our legitimate interests to give you information about our products and services that you may be interested in unless we are compelled by legal requirements to obtain your consent.
To study how our customers, use products and services from us and other organisations (e.g., statistical purposes and profiling).	<ul style="list-style-type: none"> Legitimate interests. 	<ul style="list-style-type: none"> Assessing which of our products and services may interest you. Developing personalised products and services, and what we charge for them. Defining types of customers for new products or services.
Sending you communications to service your account, products, or services.	<ul style="list-style-type: none"> Necessary for the performance of a contract. 	N/A

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To develop and manage our brand, products, and services.	<ul style="list-style-type: none"> Legitimate interests. 	<ul style="list-style-type: none"> Working out which of our products and services may interest you. Developing products and services, and what we charge for them. Defining types of customers for new products or services.
Carry out data analytics to better understand your circumstances and preferences.	<ul style="list-style-type: none"> Legitimate interests. 	To help us personalise our products and services to you.
To manage how we work with other companies that provide services to us and our customers.	<ul style="list-style-type: none"> Legitimate interests. Necessary for the performance of a contract. 	To enable another company to provide you with services you've asked for or check your suitability for products and services.
To develop new ways to meet our customers' needs and to grow our business.	<ul style="list-style-type: none"> Legitimate interests. 	We do this to improve our products and services to best meet the needs of our member/customers.
Social media.	<ul style="list-style-type: none"> Legitimate interests. 	<p>We use social media to help connect with you and share information about our products and services. Sometimes these involve using your data.</p> <p>Social media platforms may let you choose what advertising you receive. You should contact them for more information.</p>
Protecting our legal rights.	<ul style="list-style-type: none"> Legitimate interests. 	We may need to use your information to protect our legal rights (for example, collecting money owed, enforcing, or protecting our security or defending rights of intellectual property); court action; managing complaints or disputes; in the event of a restructuring of companies or other mergers or acquisition. This may be in connection with action taken against you or other persons, for example, joint borrowers or persons who give a guarantee or other security for your obligations to us.
To detect, investigate, report, and prevent fraud and money laundering and verify your identity.	<ul style="list-style-type: none"> Legitimate interests. Legal obligation. Public interest. Necessary for the performance of a contract. 	<ul style="list-style-type: none"> Developing and improving how we deal with financial crime and fraud risks. Being efficient about how we fulfil our legal and contractual duties. Protecting our business.
Risk management.	<ul style="list-style-type: none"> Legitimate interests. 	<ul style="list-style-type: none"> To conduct a thorough risk assessment before providing products and services including credit. To make sure that our business is run prudently (that is, with consideration for what may happen in the future).

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To obey laws and regulations that apply to us.	<ul style="list-style-type: none"> Legal obligation. 	N/A
To respond to complaints and seek to resolve them.	<ul style="list-style-type: none"> Legitimate interests. Legal obligation. 	To make sure that complaints are investigated so that our customers receive a high standard of service, and we can prevent complaints from arising in the future.
To run our business in an efficient and proper way. This includes managing our financial position, business capability, adding and testing systems and processes, managing communications, corporate governance, and audit.	<ul style="list-style-type: none"> Legitimate interests. 	<ul style="list-style-type: none"> To manage risk for us and our members/customers. To make sure that our business is run prudently (that is, with consideration for what may happen in the future), and we can recover the debts owed to us, as well as making sure our assets are protected.
Corporate restructuring, merger, acquisition, or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you.	<ul style="list-style-type: none"> Necessary for the performance of a contract (where personal data must be transferred for contracts to continue to be performed). Consent. Legitimate interests. 	To enable us to prepare for the corporate restructuring, merger, acquisition, or takeover. Where practicable, we will aim to wait until all or most of the conditions to closing of the transaction have been satisfied before transferring personal data.
To respond to your request for payment-initiation and account-information services for accounts you have with other providers, or if you have asked a third-party provider to ask us for information, they need so they can provide you with account-information or payment initiation services for accounts you have with us.	<ul style="list-style-type: none"> Legal obligation. Necessary for the performance of a contract. 	N/A.
Tracking or recording what you say or do e.g., phone calls, face to face meetings, letters, e-mails, live chats, video chats and any other kind of communication.	<ul style="list-style-type: none"> Legitimate interests. 	<p>We may use these to:</p> <ul style="list-style-type: none"> Check your instructions to us Assess, analyse, and improve our service Train our people. Manage risk. Prevent and detect fraud and other crimes.
Capturing CCTV images and recording in our branches and offices for safety and security.	<ul style="list-style-type: none"> Legitimate interests. 	To prevent and investigate fraud, money laundering and other crimes.

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Conducting market research and surveys.	<ul style="list-style-type: none"> • Legitimate interests. 	We do this to improve our products and services to best meet the needs of our member/customers.
Collecting IP address when using our website.	<ul style="list-style-type: none"> • Legitimate interests. 	<ul style="list-style-type: none"> • To detect suspicious activities. • To prevent and investigate fraud, money laundering and other crimes. • To protect our business. • To understand where people use our digital services.