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# Data Privacy Notice

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At Marshall Leasing Limited we take your privacy seriously and we want you to be clear about:

- What information we collect
- How we use your information
- Who we share your information with
- How you can control our use of your information

By “use” of your information we mean any use of it including, but is not limited to, viewing, obtaining, holding, processing, storing, sharing, transferring, archiving and erasing information. Please take time to read this carefully. If you have any questions now or later about how we use our information our Data Protection Officer will be happy to help you. You will find contact details at the end of this notice.

#### **(i) Who we are**

We are Marshall Leasing Limited and are part of Bank of Ireland Group plc. Your information is held by **Marshall Leasing Ltd**, who is the Data Controller and a subsidiary of **Bank of Ireland (UK) plc**. Marshall Leasing Limited is incorporated in England. Registered Office: Bow Bells House, 1 Bread Street, London, England, EC4M 9BE. Registered Number: 00156897. Bank of Ireland (UK) plc is incorporated in England and Wales. Registered office: Bow Bells House, 1, Bread Street, London, EC4M 9BE, Registered Number: 7022885. Frequently used trading names and associated companies of Marshall Leasing Limited include Northridge Finance, Bank of Ireland (UK) plc, Bank of Ireland Commercial Finance, Bank of Ireland Global Markets and Banking 365.

#### **(ii) What information we use**

We use information you give us, information about how you use our products and service and information we get from third parties. For example:

##### **(a) Identity & Contact Information**

When you or others give us information verbally or in writing - this information may be contained in application forms or in records of your transactions with us. Your information may include (but is not limited to):

- Identity & Contact Information: Name, date of birth, copies of ID, contact details, National Insurance number, online user identities, security details to protect your identity, nationality, country of birth residential status and address, email address, work and personal telephone numbers, marital status, family details.

##### **(b) Financial details/circumstances**

We may obtain information from your transaction history, including details from whom you receive money, who you pay money to, when the payments are made and how much are the payments. Your information may include (but is not limited to):

- Financial details/circumstances: bank account details (including account number, sort code), any International Bank Account Number (IBAN), currency information, payments information including payment reference information (this may identify precisely who payments to you originate from and who you make payments to), both payment payers and beneficiaries (payees) and their own account details, any Standing Orders and Direct Debits information, transaction credits, transaction debits, credit/debit card details, income details, personal guarantees provided, application processing and administration records, your employment status and employment details of your partner, credit history, credit assessment records, receipt of credit data from credit registers, credit bureau performance data, life assurance and pension details, transaction details, treasury transactions, financial needs/attitudes, contact outcomes, authorised signatories details, source of funds/wealth.

- (c) We might use information publicly available about you - for example, to help verify your address or to trace you via trade directories, on line forums, websites, Facebook, Twitter, Youtube or other social media.
- (d) Information provided by credit reference agencies, credit registration agencies, fraud prevention agencies or public agencies such as property registration authorities, government agencies, the Companies Registration Office or judgement registries.

Your information may include (but is not limited to):

- Medical information
- Criminal Conviction Data
- Marketing information including marketing preferences/contact consent
- CCTV images
- Telephone recordings
- Internet Protocol (IP) address and other relevant information to help us identify your geographic location when providing our services to you
- Legitimate information access, correction, restriction, deletion, sharing requests, and complaints
- Personal details relating to accounts transferred to NAMA.
- Other personal information including tax and sensitive information. Your information may include (but is not limited to):
  - Details of your tax residency and tax reference number(s) to enable us to comply with UK legislation including relating to any inter-governmental agreements to share tax information.
  - You may have given us sensitive information. For example information about your nationality, a disability, your health, a vulnerability or a change in your personal circumstances. Information about nationality may be used to validate your identity, for research and statistical purposes and to comply with our legal obligations. Other sensitive information will only be used to provide any support you might need to help you manage your accounts.

### **(iii) Joint Applicants and Accounts**

If you make a joint application we will also collect the personal information mentioned above about any other applicant. You must show this privacy notice to all other applicants and ensure they confirm that they know you will share their information with us for the purposes described in this Privacy Notice. If you look at the “The legal bases for use” section (below) you will see reference to consent and a description of some limited scenarios where it may be relevant to what we do with personal information. If we ask you to obtain consent from any joint applicants (such as for marketing) you should do that using the tick boxes on your application form or other consent capture mechanism that we may provide.

- When you open a joint Account or product, this may mean that your information will be shared with the other applicant(s). For example, transactions made by you can be seen by your joint Account Holder and vice versa.
- In respect of joint Accounts and products, we will treat any instruction or consent received from an individual Account Holder as an instruction or consent on behalf of all Account Holders, until such time as we are told otherwise. If any consent provided in respect of a joint Account is withdrawn, it will be withdrawn on behalf of all of you.
- For this reason, we suggest that all Account Holder(s) discuss any decisions as to Account management or Account information together prior to making any changes,

so that you each maintain full awareness of the treatment of all your personal information.

**(iv) The legal bases for use of your information and the ways in which we use it**

- (a) To enter into and perform our contract with you we use your information to:
- Manage and administer your accounts, policies or other financial products
  - Process your applications for credit or financial services
  - Where you apply for or use a credit facility – to carry out credit reviews including credit scoring and to search for details of your credit history and information at credit reference agencies where we make these searches these agencies may keep a record of the search even if the application does not proceed. This record will be available to other organisations and could affect your ability to get credit elsewhere for a short period of time. Please see “Automated Decision Making” below. The credit reference agencies we use are: Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester, LE3 4FS ([www.equifax.co.uk](http://www.equifax.co.uk)); Experian Ltd, Consumer Help Service, PO Box 8000, Nottingham, NG80 7WE ([www.experian.co.uk](http://www.experian.co.uk))
  - Process payments that are paid to or by you
  - Contact you by post, telephone, text message, electronic mail, social media, facsimile, using our online banking website or other means but not in a way contrary to your instructions to us or contrary to law
  - Monitor and recording our conversations when we speak on the telephone or through any online webchat we make available to recover debts
- (b) To protect our legitimate interests and manage our business we use your information to:
- Tell credit reference agencies about your dealings with us including details of your credit facilities and your credit history with us. We will also tell them of any default and any change of address.
  - Carry out marketing activities where relevant including research, analytics and related activities
  - Run competitions and promotions
  - Produce service information for service quality and training purposes
  - Develop and improve our products and services including for testing and validation purposes as part of future infrastructure and system enhancements (for example changes to our application and/or account management systems)
  - Compile and process your information for audit, statistical or research purposes (including anonymising your information) to help us understand trends in our customer behaviour and for helping us to understand our risks better.
  - Collect debt.
  - Prevent and detect fraud. For more information see the details provided below in the next section.
  - Enable some Bank of Ireland Group plc members to share or access your information for the purposes set out in this Privacy Notice. Please see “Sharing your information” below.
  - Carry out some profiling that does not have a legal or other significant effect on you, see “Automated Decision Making” below, risk management including arrears/debt collection and enforcement, compliance & operational risk management, data management.
  - To assist with our Group’s sale or purchase of assets Members of the Bank of Ireland Group may in the future wish to sell, transfer or merge part or all of
  - business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it. If so, we may disclose your personal information to a potential buyer, transferee, or merger partner or seller and their advisers so long as they agree to keep it confidential and to use it only to consider the possible transaction. If the transaction goes

ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this notice.

- Manage and administer the Group's legal affairs.
- Carry out business portfolio management, project management and produce management information.
- Develop and test website and systems, carry out website hosting and auditing, engage in strategic planning.
- Engage in strategic planning
- Manage designated accounts on behalf of NAMA]
- Trace you where we have a legitimate reason for doing so
- Manage property
- Procure services.
- Form a single view of your relationship with Bank of Ireland UK plc (whether as a consumer or in connection with my trade, business or profession) to enable it manage and develop the relationship.
- Gather information about your location via your use of an ATM and, if you have consented, an application you have downloaded, your mobile or some other electronic device which you may use to interact with us.
- Comply with our obligations to credit card providers.
- Comply with our obligations to voluntary codes of conduct eg Lending Standards Board.
- Adhere to guidance and best practice issued by regulators.
- Protect our business, reputation, resources and equipment.
- Carry out direct marketing provided that you have not objected to us using your information in this way.
- Transmitting your information within the Group for internal administrative purposes, including the processing of your information.
- Support network and information security. In particular this will cover processing activities which involve dealing with accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted information, and the security of the related services.
- Carry out audits, and for prudential, statistical or research purposes (including anonymising your information) to help us understand trends in our customer behaviour and for helping us to understand our risks better.
- Facilitate a potential or actual transfer of any loan or product provided to you or in connection with a securitisation we may combine information from different sources so that we can better serve your needs and understand more about you.

(c) We need to use your information to comply with our legal obligations including:

- Observation of your Information Rights.
- Provision of statutory and regulatory information and statements.
- Establishing your identity, residence and tax status in order to comply with law and regulation concerning taxation and the prevention of money laundering, fraud or terrorist financing. We are required by law to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities. As a result of this we may need to disclose information to government bodies.
- Preventing and detecting fraud, dishonesty and other crimes (for example to prevent someone trying to steal your identity) we will check your information with fraud prevention agencies and if we identify fraud, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. Fraud prevention Agencies will use your information to prevent fraud and money laundering and to verify your identity. If

fraud is detected you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies can be found on our and their websites. Please also see the section “to enter into and perform our contract with you” [section (iv) a] above.

- The Fraud Prevention Agencies we use is: Cifas, 6<sup>th</sup> Floor Lynton House, 7-12 Tavistock Square, London, WC1H 9LT ([www.cifas.org.uk/privacynotice](http://www.cifas.org.uk/privacynotice))
  - Preparation of returns to regulators and relevant authorities including preparation of income tax, capital gains tax, capital acquisition tax and other revenue returns.
  - Compliance with binding requests from regulatory bodies including the Financial Conduct Authority and the Prudential Regulation Authority.
  - Compliance with binding requests for information from other payment service providers you have instructed to act for you.
  - Compliance with binding requests for information about you from other payment service providers from whom you may have received payments in error so that the payer may contact you directly. This information will include your name, address and relevant transaction information.
  - Compliance with binding production orders or search warrants, orders relating to requests for mutual legal assistance in criminal matters received from foreign law enforcement agencies/prosecutors.
  - Compliance with disclosure orders arising in civil proceedings
  - Compliance with our obligation to provide access to your Account information to an Account Information Service Provider (AISP) or a Payment Initiation Service Provider (PISP), where you or your joint Account Holder has instructed the AISP or the PISP to access the information
- (d) To protect your vital interests. In exceptional circumstances we may use and/or disclose information we hold about you to identify, locate or protect you.
- (e) Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:
- Processing of your special categories of personal data about your health or if you are a vulnerable customer.
  - Processing that we need to do to fulfil our legal obligations and regulatory requirements.
  - When we share your personal information with other people and organisations such as members of our Group if they need to know that you are a vulnerable customer and your relatives, social services, your carer, the person who has power of attorney over your affairs.
- (f) Where you have consented to the use of your information. We will ask for your consent for direct marketing where relevant, Data Analytics, and any other uses of your information that require your consent to process some special categories of information. For example information about your physical or mental health may require your explicit consent. If this applies to you we will explain how we use and share that information when we ask for your consent.

#### **(v) Automated decision making**

- (a) We may use automated decision making when credit scoring an application you have made for credit products or services.
- When you apply for credit, an automated system known as credit scoring may be used when considering whether to agree the borrowing. It is a method of assessing your likely conduct of an account based on a range of information, including the conduct of previous similar

accounts. It is a system widely used by credit providers to help make fair and informed decisions on lending.

- Credit scoring is a form of automated decision making that may have a legal or other significant effect on you as it will indicate whether or not your application for credit is likely to be successful
- Credit scoring takes account of information from three sources - the information you provide on your application, information provided by credit reference agencies and information that may already be held about you by companies in the Bank of Ireland Group. A credit scoring system will consider information from these sources, to make an overall assessment of your application.

The credit scoring methods used are regularly tested to ensure they remain fair, effective and unbiased. Using a credit scoring system helps our Group companies to lend responsibly. If you submit an application and it is declined through this automated process, you can contact us within 21 days to have the decision reconsidered. You also have the right to ask that the decision is not made based solely using a credit scoring system.

(b) We may make decisions about you based on the profiling of your information.

Profiling is a form of automated processing of your information to evaluate, analyse or predict your economic situation, preferences, reliability, behaviour, location and may be used, for example:

- To assess your transaction history and/or current repayments and /or account balances to predict when you might want to increase an existing credit facility or consider a new loan or savings product
- when you or any authorised user on your Account uses a payment card or payment card information to perform a transaction, information may be sent to us to evaluate and determine whether to approve, decline or refer a transaction for further review
- To analyse the frequency of your use of online or mobile banking to tailor our methods of communication with you subject to any contact or marketing preferences you have expressed.

With the exception of credit scoring that is necessary for entering into a contract with you we will not use profiling to make a decision about you that has a legal or other significant effect on you without your explicit consent.

You may ask us not to make decisions about you that are based solely on automated processing. If you do this, you may not be offered some products or services that we might otherwise have offered to you.

## **(vi) Data Analytics**

(a) We may use **Data Analytics** to process your information if you have given us your consent.

Data Analytics is the analysis of your information and may be used to help us make informed business decisions to:

- Improve our understanding of your needs
- Improve the quality of products and services we can offer you
- Facilitate the development of personalised information and promotions in real time
- Reward you for your business through personalised loyalty and reward programmes.

We may, for example:

- Review your transaction history to identify your spending and saving habits
- Use your location data to send you information in relation to special offers from our partners in your then current location.

## **(vii) Sharing your information**

Where we have a lawful reason for using your information, we may also share it for the lawful reasons given below. We share your information with:

- (a) Some, but not all, members of Bank of Ireland Group plc to protect our legitimate interests. You can get a full list of the members of Bank of Ireland Group plc from our Data Protection Officer using the details at the end of this notice.
- (b) Our business partners to protect our legitimate interests. Some of our products are offered under a partnership with another organisation or via a broker or dealer. We will share your information with that partner, broker or dealer identified in your agreement with us or anyone who introduced you to us. Our business partners are Post Office Limited, AA Financial Services Limited, First Rate Exchange Services.
- (c) Insurers to protect our legitimate interests and/ or with your consent. If you apply to us for insurance we will pass your details to the insurer. If you make a claim, any information you give to us, or to the insurer, may be put onto a register of claims and shared with other insurers to prevent fraudulent claims. A list of the participants is available from the insurer. If you have a secured loan or mortgage with us, we may need to share information with other lenders who also hold a charge on your property.
- (d) Guarantors to protect our legitimate interests. We will share your information with any Guarantor of your liabilities to us.
- (e) Service providers who provide support services to protect our legitimate interests. These include, but are not limited to:
  - Marketing & market research companies
  - Analytics companies
  - Investment companies
  - Software development contractors
  - Data processors
  - Computer maintenance contractors
  - Printing companies
  - Property contractors, consultants, conveyancers and valuers
  - Document storage and destruction companies
  - Archiving services suppliers
  - Consultants and advisors including legal advisors
  - ATM administrators
  - Courts and Court-appointed persons/entities,
  - Receivers, liquidators, examiners, official Assignee for Bankruptcy and equivalent in other jurisdictions
  - Debt collection agencies, budgeting and advice agencies, tracing agencies
  - NAMA and its agents or other parties designated by or agreed with NAMA or designated under the relevant legislation
  - Business partners and joint ventures,
  - Member companies of the Finance and Leasing Association,
  - Associate members of International Factors Group,
  - Rating agencies
  - Healthcare professionals
  - Business associates and other advisers
  - Financial organisations
  - Credit reference agencies
  - Trade associations and professional bodies
  - Central and local government



- Pension fund administrators
  - Persons making an enquiry or complaint
  - Police forces and security organisations, ombudsmen and regulatory authorities
  - Fraud and financial crime prevention agencies
  - Suppliers of credit to which facilities management services are provided,
  - Credit bureau
  - Insurers
  - Re-insurers
  - Property consultants
  - Medical consultants
  - Correspondent banks and other financial institutions (e.g. for syndicated deals)
  - Finance houses, trade associations
  - Customer agents as required to provide customer services, companies to which agency services are provided
  - Credit card issuers and merchant acquirers. Visa and MasterCard
  - Keepers of asset registers
  - Supply of status opinions to other financial institutions in accordance with banking practice
  - Trustees of collective investment undertakings & pensions trustees
  - Statutory, regulatory and financial standards bodies and law enforcement authorities to comply with our legal obligations and/or to protect our legitimate interests
  - Government departments, statutory and regulatory bodies in all jurisdictions where the Bank of Ireland Group conducts business include but are not limited to:
    - Bank of England
    - Central Bank of Ireland
    - Financial Conduct Authority
    - Prudential Regulation Authority
    - Financial Services Compensation Scheme
    - Information Commissioner's Office
    - Financial Services Ombudsman
    - Lending Standards Board
    - Police
    - Her Majesty's Revenue and Customs
    - National Crime Agency
    - US, EU and other designated authorities in connection with combating financial and other serious crime.
- (f) Credit reference agencies to comply with our legal obligations and protect our legitimate interests.
- (g) Third parties in connection with a sale or purchase of assets by a member of Bank of Ireland Group plc to protect our legitimate interests. The identity of any third parties in connection with a sale or purchase of assets who are directly or indirectly interested in or participating in, whether directly or indirectly in any transfer/assignment, loan assignment/transfer and securitisation scheme, collateralisation scheme or any other encumbrance or funding arrangement howsoever arising including but not limited to the transfer of information to NAMA, its agents, appointees and related entities will be provided, where relevant, on request.
- (h) Payment facilitators to perform our contract with you. SWIFT Moneygram
- (i) Third party individuals and service providers in respect of whom you have asked that we share or allow access to your information to perform our contract with you and/or with your consent. We will act on the authority of one joint Account Holder to share or allow a third party access to any Account information including transaction detail. This means we will

treat the authority of one Account Holder as authorisation on behalf of any other Account Holder(s) for a joint Account. If you instruct us to share or allow a third party access to any Account information for a joint Account you are responsible for ensuring the other Account Holder(s) are aware and permit such access. Third parties may include (but are not limited to):

- Legal representatives
- Accountants and Financial Advisors
- Other Financial Institutions or service providers
- Family members or friends
- Debt counselling services
- Third Party Service Providers.

Currently, there are two types of third party service providers that you or your joint Account Holder may choose to instruct. They are:

- Account Information Service Provider (AISPs) which may access certain information about your Account (e.g. balance, charges, transaction history, etc.) on a continuous basis. Where you choose to instruct an AISP in respect of a joint Account, you should be mindful of the fact that personal information of your joint Account Holder may also be sent to the AISP. Similarly, your joint Account Holder may also choose to instruct an AISP resulting in your personal information being shared with the AISP without further reference to you. We will however notify you in the event that Account information has been shared with an AISP. More information about how we manage joint Accounts is set out at Joint Accounts above. If you or your joint Account Holder tells us to stop sharing information with an AISP, we will do so and tell the AISP of your instructions. We would also recommend that you contact the AISP to indicate your wishes as to its treatment of the information about your Account that it has already received.
- Payment Initiation Service Provider (PISP) which may initiate single immediate domestic sterling payments on your Account from time to time.

In order to avail of any AISP or PISP services, your Account must be accessible online. You must follow our online authorisation and verification process that we have set up for this purpose. Your Account terms & conditions will tell if you can do this and if so, the relevant terms and conditions which will apply.

- (j) Other third parties to protect your vital interests or for a substantial public interest. In exceptional circumstances only. See “The legal bases for use of your information and how we use it” above.

### **(viii) Consequences of not providing information**

We need your information in order to:

- Provide products and services to you.
- Perform our contract with you.
- Comply with our legal obligations.
- Protect our legitimate interests and manage our business.

If you chose not to provide information we will not be able to:

- Provide requested products or services to you.
- Continue to provide/ renew existing products or services.

We will tell you when we ask for information which is not a contractual requirement or needed to comply with our legal obligations.

### **(ix) Your Information Rights**

You have the following rights in relation to your information:

- To obtain confirmation as to whether or not we use your information.
- To receive a copy of or access the information we hold about you.
- Have inaccurate or incomplete information corrected and updated.
- In some circumstances, have your information deleted.
- In some circumstances, have our use of your information restricted.
- Object to the processing of your information.
- Have the information you provide to us moved or transferred.

This right allows individuals to obtain and reuse their personal information for their own purposes across different services; to move, copy or transfer their personal information easily from one environment to another in a safe and secure way without hindrance to usability. This right can only be relevant where personal information is being processed based on a consent or for performance of a contract and is carried out by automated means. This right is different from the right of access (see above) and that the types of information you can obtain under the two separate rights may be different. You are not able to obtain through the data portability right all of the personal information that you can obtain through the right of access.

- Where any processing is based on your consent, to withdraw your consent For processing that is based on your consent, you have the right at any time to withdraw it and you can do this by contacting our Data Protection Officer using the details below. The consequence of withdrawing your consent would be, for example:
- Withdrawal of marketing consent where relevant - you may not receive details of products and services from us.
- Withdrawal of consent to use special categories of data where relevant - that data may not be taken into consideration by us.
- not to be subject to a decision based solely on automated processing.

Contact our Data Protection Officer if you require a copy of the information we hold about you or about any of your information rights. You will find the contact details of our Data Protection Officer at the end of this notice. You also have the right to complain to the Information Commissioner's Office

Information Commissioner's Office

0303 123 1113, Monday to Friday between 9am and 5pm [www.ico.org.uk](http://www.ico.org.uk)

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **(x) Retention of your information**

We will only retain your information for a limited period of time based upon certain factors.

- In case of queries. We will retain the personal information that we need to keep in case of queries from you (for instance, if you apply unsuccessfully for a product or service).
- In case of claims. We will retain the personal information that we need to keep for the period in which you might legally bring claims against us.
- In accordance with legal and regulatory requirements. We will retain the personal information that we need to keep after the relevant contract you have with us has come to an end to satisfy our legal and regulatory requirements.

Factors determining period of retention of your information include:

- Any regulatory rules that we must follow that are set by authorities like the Bank of England, the Financial Conduct Authority and the Prudential Regulation Authority
- The type of financial product that we have provided to you

- Whether you and us are in a legal or some other type of dispute with another person or each other
- The type of information that we hold about you
- Whether you or a regulatory authority asks us to keep it for a valid reason.
- Whether we use your information for long term statistical modelling provided that such modelling does not affect your privacy.

**(xi) Using companies to process your information outside the EEA**

Sometimes your personal information may be transferred outside the UK or the European Economic Area. If it is processed within Europe or other parts of the European Economic Area (EEA) then it is protected by European data protection standards. Some countries outside the EEA do have adequate protection for personal information under laws that apply to us. We will make sure that suitable safeguards are in place before we transfer your personal information to countries outside the EEA which do not have adequate protection under laws that apply to us except in cases where what are called ‘derogations’ apply.

For more information about suitable safeguards and how to obtain a copy of them or to find out where they have been made available you can contact our Data Protection Officer using the details below

**(xii) Contact our Data Protection Officer**

If you have questions about how we use your information, you can reach our Data Protection Officer by writing to:

Marshall Leasing Limited - Data Protection Officer  
 PO Box 3191  
 1 Temple Quay  
 Bristol  
 BS1 9HY

**(xiii) Other Privacy Notices you should read**

Ensure you read the Privacy Notices issued by Credit Reference Agencies and Fraud Prevention Agencies. You can also access their Privacy Notices at their websites. Please see the sections “To enter into and perform our contract with you” [section (iv) a] and “To comply with our legal obligations” [section (iv) c] above. You can also access their Privacy Notices via the ‘Your Data’ section of our website [www.marshall-leasing.co.uk/yourdata](http://www.marshall-leasing.co.uk/yourdata)

If you were introduced to us by a broker or other intermediary, ask your broker or other intermediary for a copy of its own Privacy Notice if you have not already seen it. You should also ask for a copy of the Privacy Notice of any third party product and service providers you contract with, including any you ask us to share your information with or allow to access your information. For example, third party Account Information Service Providers (AISPs) or Payment Initiation Service Providers (PISPs).

#### **(xiv) Changes**

We will update this Privacy Notice from time to time on our website. Any significant changes will be notified to you by post, SMS, e-mail or when you log onto 365 online, start 365 mobile app or one of our other mobile apps.

#### **(xv) Business Products Only**

##### INFORMATION ABOUT YOUR BUSINESS

We may search the records of business data held by credit reference agencies designated by the Treasury under the power conferred by the Small and Medium Size (Credit Information Regulations 2015) and give those credit reference agencies information about your business accounts. Business data held by the credit reference agencies may be shared with other organisations authorised by you.