

About You

Personal Information and Your Identity

The Data Protection Act and how it protects you

How we use your Personal Information

How you can help us prevent crime

The Data Protection Act

The Data Protection Act puts obligations on users of personal information and lays down principles for its use. One principle states that information has to be processed fairly and lawfully. This means that you are entitled to know how we intend to use any information you provide. You can then decide whether you want to give it to us.

To provide outstanding customer service we need accurate customer information. You can help by informing us whenever your circumstances change.

Organisations must lodge a notification with the Information Commissioner describing the purposes for which they process personal information. The details are publicly available from the Commissioner's office at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (Tel 01625 545745. Fax 01625 524510). Alternatively, see the Commissioner's web site (www.ico.gov.uk).

For a full list of the companies within the HBOS Group please visit our website at www.hbosplc.com

How do we use your personal information?

Our main use of your personal information is to look after your account or to provide the specific service you require. Some details we obtain elsewhere – from credit reference agencies or your employer for instance.

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.

We may use your account details, transactions and information provided to us by third parties in our customer contact programme.

Occasionally, members of our group of companies may contact you by letter, telephone, e-mail, text message or otherwise to inform you about other products and services that may interest you. We try to limit our customer contact programme to acceptable levels, but if you wish to exercise your right to opt out, simply inform your local branch or let us know by any means convenient for you. Alternatively you can write to us at Data Unit, Freepost NWW15306, City House, City Road, Chester CH88 3YZ. **Remember, however, that opting out could stop us contacting you about any of our products or services that may benefit you. For**

example, you may not hear about a new savings or mortgage product that offers you a better rate or saves you money.

To meet the requirements of the Banking Code and our regulator the Financial Services Authority (FSA), we are obliged to contact you shortly before the maturity of any fixed term or fixed rate products. This ensures that you are aware of the options available and helps you make an informed decision about your maturity instructions.

Unless you have given us your consent, we will not provide information about you to companies outside our group to use for their own marketing purposes. Sometimes we need to give information to our agents and subcontractors so that they can provide a particular service for us. Sometimes, these companies may be located abroad in countries that do not have data protection laws. In these circumstances we always take great care to ensure that your personal information is kept safe and secure. If you hold a credit or debit card with us we will share transaction details with our scheme providers (e.g. Visa Europe). Your information may also be shared by other members of our group to keep their records up to date and administer your relationship with them.

We are also committed to meeting the standards set by the Banking Code, copies of which are available in our branches.

Occasionally, the Banking Code Standards Board, who monitor compliance with the Banking Code, audit a sample of our customer records to assess our compliance with the Codes. Whenever this happens, strict confidentiality conditions are always imposed.

Under the Data Protection Act you have the right of access to your personal data. The Act allows us to charge a fee of £10 for this service. If anything is inaccurate or incorrect, please let us know and we will correct it.

If you do not want to receive unsolicited mail from other companies, you can prevent this by registering with the Mailing Preference Service. In addition, the Telephone and Fax Preference Services enable you to object to receiving unsolicited marketing phone calls or faxes from other companies. To register, simply telephone the appropriate number i.e.

Mailing Preference – **020 7291 3310**
 Telephone Preference – **020 7291 3320**
 Fax Preference – **020 7291 3330**

For more details about all the Preference Services, please see the Direct Marketing Association's web site (www.dma.org.uk).

Credit referencing

If you apply for any of our credit-based products (e.g. mortgage, personal loan, credit card, current account or Share Dealing account), we will perform a search with a Credit Reference Agency. The agency will keep a record of the search.

After you open a credit-based product, we will provide the agency with regular

information about how you use it, including any changes to your personal information such as previous or subsequent names. Similar information may also be given about your other lending/credit relationships with members of the HBOS group. Other lenders may use this to make decisions on future applications for credit. It may also be used for tracing debtors and to prevent fraud.

When opening accounts we may search public records such as the Electoral Roll that are available from Credit Reference Agencies to help us verify your identity.

Occasionally we search credit and fraud prevention agency records, as well as our own group records, to manage your account and take credit decisions such as whether to offer credit or continue to offer existing credit. These searches are not seen or used by other lenders to assess your ability to obtain credit. 'Associations' linking your financial records may be created on Credit Reference Agency records when you apply for accounts in joint names. Your financial records, and those of anyone financially associated with you, including records held in previous or subsequent names may be considered in any future applications you make.

You can ask the Credit Reference Agencies for a copy of your credit file. Our Credit Scoring leaflet contains the relevant forms to help you apply. Please ask any branch for a copy. Alternatively, you can apply online. If there is anything incorrect on your credit file, you can ask the agencies to add a Notice of Correction.

UK Credit Reference agencies are as follows:

Experian Ltd

Consumer Help Service
PO Box 8000
Nottingham NG80 7WF
Tel 0870 241 6212*
www.experian.co.uk

Equifax plc

Credit File Advice Centre
PO Box 1140
Bradford BD1 5US
Tel 0870 010 0583*
www.equifax.co.uk

Callcredit plc

Consumer Services Team
PO Box 491
Leeds LS3 1WZ
Tel 0870 060 1414*
www.callcredit.plc.uk

If you have been refused credit you can get advice from your local Trading Standards Department, Citizens Advice Bureau or Consumer Advice Centre and the agencies' web sites. The Information Commissioner also produces a useful leaflet entitled 'Credit Explained'. You can obtain a free copy on the Commissioner's website or by telephoning 0870 600 8100*.

Credit scoring

If you apply to us for a credit-based product, the details you provide, the information we already have and information from credit reference agencies are used to assess credit risk using a technique called 'credit scoring'. Various factors in all these details help us to assess the risk. A score is given to each factor and a total credit score obtained. If your score is above a confidential pre-set

pass score, the application is likely to succeed. For more details please ask for our 'Credit Scoring' leaflet.

Crime prevention and detection

We have systems that protect our customers and ourselves against fraud and other crime. Customer information can be used to prevent crime and trace those responsible. We may check your details with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering, for example, when:

- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance;
- Checking details of job applicants and employees.

Please telephone us on 0845 604 5494* if you want to have details of those credit reference agencies and fraud prevention agencies from whom we obtain and with whom we record information about you. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. You have a legal right to these details.

* Calls from BT landlines will cost a maximum of 5p per minute. The price of calls from other telephone companies will vary

Introducers and Affinity Partners

If you were 'introduced' to us by a third party and/or have a relationship with or are supporting one of our affinity partners, we will give them your contact details and sufficient information about you to help with their accounting and administration. Introducers or affinity partners may use these details to contact you about products and services unless you have asked them not to do so.

Anti-Money laundering and statutory obligations

To comply with money laundering regulations, there are times when we need to confirm (or reconfirm) the name and address of our customers. This information may be shared with other HBOS Group companies. For more details about identity checks, please refer to 'Money laundering . . . how it affects you' on page 7.

Some Acts of Parliament oblige us to disclose information about our customers to certain bodies with statutory powers. For example, we must give information to authorised benefit fraud investigators where fraudulent benefit claims are suspected. In addition, the Inland Revenue has the statutory authority to audit our customers' accounts from time to time.

E-mail

If you e-mail us, or give us your e-mail address, we will keep a record of it. We may use it to contact you occasionally about other products and services which may interest you, unless you ask us not to do so. We will not give your e-mail address to any unauthorised third parties.

When e-mailing us, always use the e-mail facility on our websites to make sure that the content of your e-mail is secure. If you send us e-mail in other ways, remember that it will be 'insecure' and could be intercepted. If you do send us 'insecure' e-mail, please keep the amount of confidential information you include to a minimum. We will do likewise when we reply.

Phone calls

We may record phone conversations to offer you additional security, resolve complaints and improve our service standards. Conversations may also be monitored for staff training purposes.

Responsibility for customer confidentiality

Our employees are personally responsible for maintaining customer confidentiality. We provide training and education to all our staff to remind them about their obligations. Our policies and procedures are regularly audited and reviewed.

Sensitive information

The Data Protection Act defines certain information as 'sensitive' (racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal proceedings and offences). If you apply to us for insurance, a pension, health insurance or life assurance, we may ask you for some 'sensitive' details. We will only use this information to provide the service you require and we will ask for your explicit consent. As an HBOS customer, there may be times when you give us sensitive information. We may share it with other parts of the HBOS group and our subcontractors to keep your records up to date. Some transactions that you (or an additional cardholder) make on a card account may cause sensitive or confidential details to appear on your statement. If your card is used for such transactions, we believe that the details appear on your statement with your explicit consent.

Business customers

The Data Protection Act does not generally apply to companies but it does cover sole traders and partnerships. When we receive an application from a business we may perform a search with a credit reference agency on the individual company directors or partners.

Money laundering... how it affects you

When you open an account with HBOS you will be asked to provide information or documents to confirm your identity. This will happen whether you are applying to be a new customer with us or have been one for some time. We ask for this information to comply with money laundering regulations and to help stop criminals using financial products or services to launder money.

You will also be asked to provide some personal details if you use the services of Halifax Estate Agents and may be asked for proof of your name and/or address.

As well as our legal responsibility, our aim as a major bank is to do all we can to combat financial crime and protect our customers from fraud.

The regulations also protect you from criminals who might otherwise falsely use your name, without you ever knowing.

Criminals need to hide the money they make from their illegal activities so it can't be traced by the authorities. They may do this by trying to get their money into a bank, often using a false name and address, because once the money is in the financial system, it's harder to track down and confiscate.

Where more than one person is applying, we may need to confirm the name and address of each of you.

Special rules apply in some cases, for example, for non-personal accounts, and where the application is made on behalf of a trust or if you are acting under a power of attorney. Please ask for more information.

Identity check

When you open an account with us, we'll ask you to prove who you are and where you live. The evidence you give us, confirming your name and address, helps us to stop anyone else from falsely using your details to open an account.

Your personal details

As part of our security checks, we'll usually ask you for the following information:

- Your name and address (documentary proof is needed).
- Your nationality and country of residence.
- Your date of birth.
- Your occupation.
- How you expect to fund your account.

Giving us proof

Proving your identity is simple. Each applicant just needs to show us a couple of original documents containing your name and address. We will make a record of the details. The types of documents we accept are common to most people, so you shouldn't have any difficulty producing at least two of them.

For added security, if you are confirming your name and address by post, we may need to see up to three documents, as explained below.

To comply with Regulatory obligations it may be necessary to retain copies of certain documents you may provide to verify your name or address.

You can provide us with proof of your name and address either in person at one of our branches or by post.

In-branch

If you're providing us with proof of your name and address in person, all you need do is show us **two original** documents – one from the name list and one from the address list. Once we've taken a record of the relevant information, we'll give them straight back to you.

By post

If you are providing proof of your name and address by post, we will need to see **three original** documents from the lists below, at least one from the name list and at least one from the address list. These must be **three** separate documents. Once we've looked at them, we'll send them straight back to you.

If you are concerned that documents may go astray you can of course show them to us at your nearest branch or agency. If you are doing this, however, please bring in only two items from the lists as described above.

Please note that you can't use the same document to confirm both your name and address.

To confirm your name

- Current full-signed passport
- Current EEA Member State Identity Card
- Northern Ireland Electoral ID Card
- Current Residence permit (issued by the Home Office to EU nationals)
- Current UK or EEA Photo Card driving licence (full or provisional)
- Current UK (old paper style) full driving licence (old style provisional is not acceptable)
- Current benefits book or original notification letter confirming your right to benefits or state pension
- Construction Industry sub-contractor's photo registration card or certificate: CIS(P), CIS(T), CIS5 or CIS6 (issued by HM Revenue & Customs)
- Current Revenue tax notifications e.g. tax assessment, statement, and notice of coding. **Note, P45s and P60s are not acceptable**
- Current Shotgun or Firearms Certificate

If you can't provide the above documents, please provide one or more of the following:

- Current Blue Disabled Driver's Pass
- Birth certificate or NHS Medical Card (if you're under 18)
- Recent systems-generated or signed documentation from a regulated financial services sector firm indicating that the account/investment/insurance relationship exists and which contains your address*
- Most recent utility bill, utility statement or a certificate from a supplier of utilities confirming the arrangement to pay for the services on pre-payment terms (includes landline telephone/landline cable company bills, but excludes all mobile telephone bills) **This option can be used for confirmation of your name by post only and therefore cannot be used in branch.**
- Current EEA Member State Identity Card
- Northern Ireland Electoral ID Card
- Most recent utility bill, utility statement or certificate from a supplier of utilities confirming the arrangement to pay for the services on pre-payment terms (includes landline telephone/landline cable company bills, but excludes all mobile telephone bills)
- Solicitor's letter confirming recent house purchase or land registry confirmation (previous address must also be verified)
- Current local council rent card or tenancy agreement
- Current benefit book or original notification letter confirming your right to benefits or state pension
- Revenue correspondence addressed to the applicant at the applicant's stated address (provided that Revenue Tax Notifications have not been used as evidence of proof of name)

To confirm your address

- Recent systems-generated or signed documentation from a regulated financial services sector firm indicating that the account/investment/insurance relationship exists and which contains your address*
- Current local authority tax bill
- Current UK or EEA Photo Card driving licence (full or provisional)
- Current UK (old paper style) full driving licence (old style provisional is not acceptable)

If you can't provide the above documents, please provide one or more of the following:

- Current TV Licence (pre-printed) or renewal/reminder letter
- Current Vehicle Licence reminder

* A card, passbook or statement for an account held with another part of the HBOS Group can be accepted as one (but not the only) proof of either name or address.

Got a problem?

Don't worry if you're unable to provide any of the standard documents. For example, we realise that you may not have a passport or driving licence, or any bills or statements addressed to you because accounts may be held in your partner's name.

There are other documents we might be able to accept, and we have other ways of confirming your name and address, such as checking the Electoral Register. **So just tell us your situation and we'll advise you.**

Peace of mind

The security steps we take when opening your account are a legal requirement, and if you cannot give us satisfactory proof of your identity, we are not allowed to open an account for you. Please remember the security checks are also for your own protection and we hope they will also give you peace of mind.

Xtra[®] help

Additional needs

We are committed to meeting the needs of all our customers. If you have a hearing or speech impairment, you can use Typetalk whenever you contact us, or contact us using Textphone on 08457 323 436 (lines open 9am – 5pm, 7 days a week). For visually impaired customers, we can provide documents in large print, Braille or on audio cassette. Please speak to a member of staff.

Customer complaints

Our aim is to please – but we know that sometimes things go wrong. If you have a problem we want to know. A colleague will be happy to help either over the phone or at a branch.

A copy of our complaints procedure is available on request.

Complaints we cannot settle may be referred to the Financial Ombudsman Service.

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