

## Annex 1

### Purpose and lawful basis for processing of personal data

This table sets out:

- What personal data we process
- What we use that data for
- The lawful basis for the processing

It forms part of our privacy policy [\[link\]](#) which you should also read.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer and manage your account with us	(a) Identity (b) Legal documents such as any power of attorney (c) Contact (d) Financial (e) Transaction	Performance of a contract with you
To process and consider your mortgage/ loan application including:  (a) verify information you give to us or information we receive about you and your identity (b) manage payments, fees and charges (c) collect and recover money owed to us (d) fraud prevention purposes (e) credit and/or behaviour scoring (f) make enquiries from previous/existing lenders or employers, landlords, accountants, bankers, the Land Registry and/or HMRC (g) to make searches and receive references (h) to comply with Court Production Orders	(a) Identity (b) Legal documents such as any power of attorney (c) Contact (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to protect our business by recovering debts due to us, fraud prevention and checking suitability of applicant) (c) Necessary to comply with a legal obligation
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our

(c) Responding to any queries you submit		products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests to develop our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business) (b) Consent
To understand your circumstances and needs to determine whether you are a vulnerable customer and (where required) respond to such needs in accordance with the Financial Conduct Authority's guidance on the fair treatment of vulnerable customers (FG21/1).	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Special category personal information (e.g. health information) (g) Criminal offence data	(a) Consent (b) Substantial Public Interest (where necessary for the purposes of protecting the economic well-being of an individual) (c) Vital Interest (where necessary to protect the life of an individual)