

Privacy Policy

Effective from 18th May 2023

PRIVACY

Login Problem,
Wrong username or password



Vernon
Building Society

Head Office

19 St Petersgate
Stockport,
Cheshire, SK1 1HF
Tel: 0161 429 6262

Email: info@thevernon.co.uk

www.thevernon.co.uk



Telephone calls are recorded and may be monitored for regulatory and training purposes to help maintain service quality.

Vernon Building Society is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and Prudential Regulation Authority (registration number 195475)

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1

How we use your personal information

Information that is about you, or from which you can be identified will be held by the Vernon Building Society. This information includes what you tell us about yourself, what we learn about you by you being a customer and the choices you tell us about what marketing you want us to send to you. This Notice also tells you about your privacy rights and how the law protects you.

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Personal information and the law

Contacting us

You can contact us about anything in this Privacy Notice. If you have any queries or want more details about how we use your personal information, you can ask us by:

Emailing

risk@thevernon.co.uk;

Writing to

Data Protection Officer,
Vernon Building Society,
19 St Petersgate, Stockport SK1 1HF.

Telephoning

0161 429 6262 (between 8.45am - 5.00pm
Mon to Fri, 8.45am - 12.00pm Sat)

Calls may be monitored or recorded.

3

How the law protects you

This section tells you the legal reasons we rely on for each of the ways your personal information is used. Your privacy is protected by law and this section also tells you how that works.

Data Protection law says that we're allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside the Vernon Building Society. The law says that we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it's our legal duty, or
- When it's in our legitimate interest, or
- When you consent to it.

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is if we are going to rely on it as the reason for using your data. Even then, we must not use it unfairly or against your interest.

The law and other regulations treat some types of sensitive personal information as 'Special'. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data and criminal records.

We will not collect or use these types of data without your explicit consent unless the law allows us to do so. If we do, it will only be when it's necessary.

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How we use your personal information

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

SERVING YOU AS A CUSTOMER

What we use your personal information for

To manage our relationship with you;
To develop and carry out marketing activities;
To study how our customers use products and services from us and other organisations; and
To communicate with you about our products and services

Our reasons

Your consent;
Fulfilling contracts;
Our legitimate interests;
or
Our legal duty.

Our legitimate interests

Keeping our records up to date, working out which of our products and services may interest you and telling you about them;
Developing products and services and what we charge for them;
Seeking your consent when we need to contact you; and
Being efficient about how we fulfil our legal and contractual duties.

MANAGING OUR OPERATIONS

What we use your personal information for

To deliver our products and services;
To make and manage customer payments;
To manage fees, charges and interest due on customer accounts;
To collect and recover money that is owed to us; and
To manage and provide treasury and investment products and services.

Our reasons

Fulfilling contracts;
Our legitimate interests;
or
Our legal duty.

Our legitimate interests

Being efficient about how we fulfil our legal and contractual duties; and
Complying with rules and guidance from regulators.

MANAGING SECURITY, RISK & CRIME PREVENTION

What we use your personal information for

To detect, investigate, report and seek to prevent financial crime;
To manage risk for us and our customers;
To obey laws and regulations that apply to us; and
To respond to complaints and seek to resolve them.

Our reasons

Fulfilling contracts;
Our legitimate interests; or
Our legal duty.

Our legitimate interests

Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect;
Complying with rules and guidance from regulators; and
Being efficient about how we fulfil our legal and contractual duties.



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How we use your personal information

BUSINESS MANAGEMENT

What we use your personal information for

To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, adding and testing systems and processes, managing communications, corporate governance, and audit.

Our reasons

Our legitimate interests;
or
Our legal duty.

Our legitimate interests

Complying with rules and guidance from regulators; and
Being efficient about how we fulfil our legal and contractual duties.

BUSINESS IMPROVEMENT

What we use your personal information for

To test new products
To manage how we work with other companies that provide services to us and our customers;
To develop new ways to meet our customers' needs and to grow our business; and
To exercise our rights set out in agreements or contracts.

Our reasons

Fulfilling contracts;
Our legitimate interests; or
Our legal duty;

Our legitimate interests

Developing products and services, and what we charge for them;
Defining types of customers for new products or services; and
Being efficient about how we fulfil our legal and contractual duties.

FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

What we use your personal information for

Substantial public interest

Responding to regulatory requirements

Legal claims

Consent

Our reasons

Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour; and
Using criminal and health information as needed to provide insurance products.

Showing whether we have assessed your situation in the right way; and

Passing information to the regulator as needed to allow investigation into whether we have acted in the right way.

Using any special categories of data as needed to establish, exercise or defend legal claims.

Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so.

Types of personal information

This explains what the different types of personal information that are covered by Data Protection Law mean.

| TYPE OF PERSONAL INFORMATION | DESCRIPTION |
|------------------------------|---|
| Financial | Your financial position, status and history |
| Contact | Your name, where you live and how to contact you |
| Socio-Demographic | This includes details about your work or profession, nationality, and where you fit into general social or income groups. |
| Transactional | Details about payments to and from your accounts with us, and insurance claims you make. |
| Contractual | Details about the products or services we provide to you. |
| Behavioural | Details about how you use products and services from us. |
| Communications | What we learn about you from letters and emails you write to us and conversations between us. |

| TYPE OF PERSONAL INFORMATION | DESCRIPTION |
|------------------------------|--|
| Open Data & Public Records | Details about you that are in the public records, such as the Electoral Register, and information about you that is openly available on the internet. |
| Usage Data | Other data about how you use our products and services. |
| Documentary Data | Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, driving license, birth certificate or utility bill. |
| Special Types of Data | <p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do:</p> <ul style="list-style-type: none"> • Racial or ethnic origin; • Religious, political or philosophical beliefs; • Trade union membership; • Genetic and biometric data; • Health data; • Lifestyle information including data related to sex life or sexual orientation; • Criminal records of convictions and offences; and • Allegations of criminal offences. <p>You can read how we may use special types of data in 'How the law protects you.'</p> |
| Consents | Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you, whether you get paper statements, or prefer large print formats. |
| National Identifier | A number or code given to you by a government to identify who you are, this could be a National Insurance number or Social Security number or Tax Identification Number (TIN). |



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Where we collect personal information from

This section lists all the places where we get data that counts as part of your personal information. We may collect personal information from any of these sources:

Information provided by you:

- When you apply for our products and services;
- When you talk to us on the phone or in a branch, including recorded calls and notes we make;
- When you use our website;
- By emails and letters;
- In insurance claims or other documents;
- In financial reviews and interviews;
- In customer surveys; and
- If you take part in any of our competitions or promotions.

Data we collect when you use our services:

This covers details about how you use our services, and account activity.

Payment and transaction data

This includes the amount, frequency, type, location, origin and recipients. If you borrow money, it also includes details of repayments and whether they are made on time and in full.

Profile and usage data

This includes the security details you create and use to connect to our Online Services. It also includes your settings and marketing choices. We also use cookies and other internet tracking software to collect data while you're using our website. You can find out more about this in our Cookie Policy, which is available on the footer of our website.

Data we collect from outside sources:

- Companies that introduce you to us, such as a mortgage broker or intermediary, or a solicitor;
- Financial Advisers;
- Other lenders;

- Landlords;
- Credit reference agencies such as Transunion, Equifax & Experian;
- Insurers;
- Land Agents such as property valuers;
- Public Directories such as the Electoral Register & Companies House;
- Fraud prevention agencies;
- Government & Law Enforcement agencies;
- Payroll service providers;
- Companies House;
- Your employer; and
- Debt recovery; and tracing agents.

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How long we keep your personal information

This section explains how long we may keep your information for and why.

We will keep your personal information for as long as you're a customer of the Vernon Building Society. We may keep your data for up to 15 years after you stop being a customer. The reasons we will do this are:-

- To respond to a question or complaint, or to show whether we gave you fair treatment; and
- To obey rules that apply to us about keeping records.

We may also keep your data for longer than 15 years if we cannot delete it for legal, regulatory or technical reasons. An example being we have to hold some personal information for longer to resolve or defend ongoing claims.

We will only use your personal information for those purposes and will make sure that your privacy is protected.

You can get more information about how long we keep data by contacting our Data Protection Officer.

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If you choose not to give personal information

You can choose not to give us personal information. In this section we explain the effects this may have.

We may need to collect personal information by law, or to enter into or fulfil a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from fulfilling our contract with you, or doing what we must do by law. It may also mean that we cannot run your accounts with us. It could mean that we have to cancel a product or service you have with us.

We sometimes ask for information that's useful but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it won't affect the products or services you have with us.

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Cookies

This section contains details of our Cookie Policy. Our full Cookie Policy can be found within the footer of our website www.thevernon.co.uk

Cookies are small computer files that get sent to your PC, tablet or mobile phone by websites when you visit them. When you revisit these sites the cookie identifies you as a previous visitor.

Cookies store information about your visits to that website, such as your choices and other details. Some of this data does not contain personal details about you, but is still protected by this Privacy Notice.

We use cookies solely to gather information on IP addresses, to analyse trends, administer the website, track your movements on the website and gather broad demographic information for aggregate use. We may use cookies to provide

tailored marketing messages when you are logged into our website, if you have given consent.

To find out more about how we use Cookies, please see our Cookie Policy.

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How to Complain

This section gives details of how to contact us to make a complaint about data privacy. It also shows you where you can get in touch with the government regulator.

Please let us know if you are unhappy with how we have used your personal information. See Contacting Us (Section 2) for how you can do this.

You also have the right to complain to the regulator, and to lodge an appeal if you're not happy with the outcome of a complaint. This is the Information Commissioner's Office.

Find out on their website how to report a concern www.ico.org.uk

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How to withdraw your consent

This section explains what to do if you no longer want us to hold your personal information.

You can withdraw your consent at any time. Please contact us by emailing risk@thevernon.co.uk if you want to do so.

This will only affect the way we use information when our reason for doing so is that we have your consent. See the section 'Your Rights' about more generally restricting the use of your information.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.



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Letting us know if your personal information is correct

This section explains how to contact us if you think the information we hold for you is wrong, incomplete or out of date.

You have the right to question any information we have about you that you think is incorrect. We'll take reasonable steps to check this for you and correct it.

If you want to do this, please contact our Data Protection Officer. See Contacting Us (Section 2) for how you can do this.

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How to get a copy of your personal information

This section tells you where to write to us to get a copy of your personal information, and how to ask for a digital file you can use yourself or share easily with others. This is called a Subject Access Request.

You can do this by writing to our Data Protection Officer at this address:

Data Protection Officer
Vernon Building Society
19 St. Petersgate
Stockport
Cheshire
SK1 1HF

When you want to share your data with outside companies

You also have the right to get certain personal information from us as a digital file, so that you can keep and use it yourself, and give it to other organisations if you choose to.

We will provide it to you in an electronic format that can be easily reused, or you can ask us to pass it on to other organisations for you. If you want us to do this, please write to the Society's Data Protection Officer. See Contacting Us (Section 2) for how you can do this.

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Your rights

This section explains about your right to object and other data privacy rights you have and how to contact us about them.

You can object to us keeping or using your personal information. This is known as the '**right to object**'. You can also ask us to delete, remove or stop using your personal information if there is no need for us to keep it. This is known as the '**right to erasure**' or the '**right to be forgotten**'.

There may be legal or other official reasons why we need to keep or use your data. Please tell us if you think that we shouldn't be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights.

You can ask us to restrict the use of your personal information if:

- It's not accurate;
- It's been used unlawfully but you don't want us to delete it;
- It's not relevant any more, but you want us to keep it for use in legal claims; and
- You have already asked us to stop using your data but you're waiting for us to tell you if we are allowed to keep on using it.

If we do restrict your information in this way, we won't use or share it in other ways while it's restricted.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please write to the Society's Data Protection Officer. See Contacting Us (section 2) for how you can do this.

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Who we share your personal information with

We may share your personal information with outside organisations such as law enforcement and government agencies, and financial services information providers. This is so we can provide you with products and services, run our business, and obey rules that apply to us. The types of organisations that we may share your personal information with are listed below.

We share your information with;

Official bodies that include:

- Central and local government
- HM Revenue & Customs, regulators and other tax authorities
- UK Financial Services Compensation Scheme and other deposit guarantee schemes
- Law enforcement and fraud prevention agencies

Banking & Financial Services

Outside companies that we work with to provide to you to run our business.

- Agents, suppliers, sub-contractors and advisers. These are types of firms that we use to help us run accounts, policies and services.
- Agents who help us to collect what is owed to us.
- Credit Reference Agencies such as Transunion, Equifax & Experian.
- Someone linked with you or your product or service. This could mean a joint account holder, guarantor, trustee, or fellow company director.
- Other financial services companies. To help prevent, detect and prosecute unlawful acts & fraudulent behaviour.
- Employers. To confirm your identity if we ask for a mortgage reference.
- Companies you ask us to share your

information with. This could be a Claims Management Company or a solicitors firm.

- Financial Advisers. This could be someone who advises you on things like investments and life assurance, will writing.

Insurers & Legal Providers

We share personal information with insurers and legal providers to provide you with products and services.

- If you apply for insurance or legal services through us, we will pass your personal information to the insurer/legal providers.

Other Services and Schemes

These are organisations that we may need to share your personal information with, because of what you can do with the product or service you have with us.

- If you use Direct Debits, we will share your data with the Direct Debit scheme.
- If you have a mortgage with us, we may share information with other lenders who also hold a charge on the property. This could be the other party in a shared ownership scheme or a guarantor.

General Business

Outside companies we use to help grow and improve our business.

- Organisations that introduce you to us. This could be a mortgage broker or introducer.

Data Processors

These are outside companies we use to send you correspondence or send you marketing information.

Our Data Processors cannot do anything with your personal information unless we have told them to do it. They will not share your personal information with any organisation



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How we work out what marketing you receive

We use marketing to let you know about products, services and offers that you may want from us. This section tells you how we decide what marketing to show or send you. It also explains how we work out what you may be interested in.

We may use your personal information to make decisions about what products, services and offers we think you may be interested in. This is what we mean when we talk about 'marketing'.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not conflict unfairly with your own interests.

The personal information we have for you is made up of what you tell us, data we collect when you use our services, or from outside organisations we work with. We may use your data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you.

This is called profiling for marketing purposes. You can contact us at any time and ask us to stop using your personal information this way.

If you allow it, we may show or send you marketing material online (on our own websites including social media), by notifications on our website, email or by post.

What information you get will depend on marketing choices that you set. You can change these at any time and tell us to stop sending you marketing.

You can also tell us not to collect data while you are using our website. If you do, you will still see some marketing but it won't be tailored to you. See our Cookie Policy,

available in the footer of our website for details about how we use this data to improve our website.

Whatever you choose you will still receive other important information such as changes to your existing products and services.

We do not sell the information we have about you to other organisations outside the Vernon Building Society.

We may ask you to confirm or update your choices, if you take new products or services with us in the future. We will also ask you to do this if there are changes in the law, regulation or the structure of our business.

If you change your mind you can contact us to update your choices at any time. See Contacting Us (section 2).

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How we use your information to make automated decisions

In this section we tell you how we may use automated systems to help us make decisions about you and your money.

We may use automated systems sometimes to make decisions about you, but we may use some systems to help us make decisions. This helps us to make sure our decisions are fair, efficient, and correct based on what we know.

This does not affect the products, services or features we may offer you now or in the future, or the price you're charged for them.

Here are the types of automated decisions we may use to help us:

Detecting Fraud

We use your personal information to help decide if your accounts may be being used for fraud or money laundering. We may detect that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that is unusual for you. If we think there is a risk of fraud, we may stop activity on the accounts or refuse

access to them.

Opening Accounts

When you open an account or mortgage with us we check that you meet the conditions needed to open it. This may include checking age, residency, nationality or financial position.

Approving Credit

We use a credit reference agency as one of the ways to help us decide whether to lend money to you when you apply for a mortgage. It gives us past data that tells us how you've acted before when paying back money you've borrowed.

For more information see Credit Reference Agencies (section 17).

Your rights

We do not use automated decisions alone. If we do so, you have rights over these.

- You can ask that we don't make decisions based on automated systems only.
- You can object to an automated decision, and ask that a person reviews it.

If you want to know more about these rights please contact us. See Contacting Us (section 2) for how you can do this.

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Credit Reference Agencies (CRA's)

This section explains how we work with outside companies to decide whether to lend you money when you apply for a mortgage. It explains what we do and why we do it.

We carry out identity checks when you apply for a product or services, and a credit check when you apply for a mortgage with us. We use Credit Reference Agencies to help us with this.

If you use our services, from time to time we may also search information that CRA's have to help us manage those accounts.

We will share your personal information with CRA's and they will give us information.

The data we exchange can include:

- Name, address and date of birth;
- Credit application;
- Details of any shared credit;
- Financial situation and history;
- Fraud prevention information; and
- Public information, from sources such as Electoral Register and Companies House

We use this data to:

- Assess whether you can afford to make repayments;
- Make sure what you've told us is correct and true;
- Help detect and prevent financial crime;
- Manage your accounts with us;
- Trace and recover debts; and
- Tell you about relevant offers.

We will go on sharing your information with CRA's for as long as you are a customer. This will also include details of funds going into the account, and the account balance. If you borrow, it will also include details of your repayments and whether you repay in full and on time. We will also tell the CRA's when you settle your accounts with us. The CRA's may give this information to other organisations that want to check your credit status.

When we ask CRA's about you, they will note it on your credit file. This is called a credit search. Other lenders may see this and we may see credit searches from other lenders.

If you apply for a product with someone else, we will link your records with theirs. We will do the same if you tell us you have a spouse, partner, or civil partner. You should tell them about this before you apply for a product or service. It is important that they know your records will be linked together, and that credit searches may be made on them.

CRA's will also link your records together. These links will stay on your files unless one of you asks the CRA's to break the link. You will



normally need to give proof that you no longer have a financial link with each other.

You can find out more about the CRA's on their websites, in their own Privacy Notice. This includes details about:

- Who they are;
- Their role as fraud prevention agencies;
- The data they hold and how they use it;
- How they share personal information;
- How long they keep data; and
- Your data protection rights.

The Vernon Building Society mainly uses Transunion, but your personal information will be shared with all Credit Reference Agencies.

Here are the details of the three main Credit Reference Agencies;

Transunion

www.transunion.co.uk

One Park Lane,
Leeds
LS13 1EP
Telephone: 0330 024 7574
Email: customer.relations@transunion.co.uk

Experian

www.uk.experian.com

Consumer Helpdesk Service Centre
PO Box 8000,
Nottingham,
NG80 7WF
Telephone: 0344 481 0800 / 0800 013 8888
Email: consumer.helpservcie@uk.experian.com

Equifax

www.equifax.co.uk

Customer Service Centre
POI Box 10036,
Leicester ,
LE3 4FS
Telephone: 0333 321 4043 / 0800 014 2955
Email: www.equifax.co.uk/ask

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Fraud Prevention Agencies

This section tells you about the information we share outside the Vernon Building Society to help fight financial crime. This includes crimes such as fraud, money laundering and terrorist financing.

We may need to confirm your identity before we provide products or services to you. This may include carrying out fraud checks at the point of application.

Once you have become one of our customers, we will share your personal information as needed to help combat fraud and other financial crime. The organisations we share data with are:

- Registered Fraud Prevention Agencies (FPA's);
- Other agencies and bodies acting for the same purpose; and
- Industry databases used for this purpose.

Throughout our relationship with you, we and these organisations exchange data between us to help prevent, deter, detect and investigate fraud and money laundering.

None of us can use your personal information unless we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'.

When we have a business or commercial reason of our own to use your information, this is called a 'legitimate interest'. We will tell you what that is, if we are going rely on it as the reason for using your data. Even then, it must not unfairly go against your interests.

We will use the information to:

- Confirm identities;
- Help prevent fraud and /money laundering; and
- Fulfil any contracts you have with us.

We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to prevent, detect, investigate and prosecute crime.

These organisations can keep personal information for different lengths of time, up to six years.

The information we use

These are some of the kinds of personal information that we use:

- Name;
- Date of birth;
- Residential address;
- History of where you have lived;
- Contact details, such as email addresses and phone numbers;
- Financial data;
- Whether you have been a victim of fraud;
- Employment details; and
- Data that identifies computers or other devices you use to connect to the internet. This includes your Protocol (IP) address.

Automated decisions for fraud prevention

The information we have for you is made up of what you tell us, data we collect when you use our services, or from third parties we work with.

We and other organisations acting to prevent fraud may process your personal information in systems that look for fraud by studying patterns in the data. We may find that an account is being used in ways that fraudsters work. Or we may notice that an account is being used in a way that's unusual for you. Either of these could indicate a risk that fraud or money laundering may be carried out against a customer or the Vernon Building Society.

How this can affect you

If we or a FPA decide there is a risk of fraud, we may stop activity on your accounts or block access to them. FPA's and cross industry organisations may also keep a record of the risk that you may pose.

This may result in other organisations refusing to provide you with products or services, or to employ you.

Data transfers out of the European Economic Area (EEA)

FPA's and other organisations we share data with for these purposes may send personal information to countries outside the EEA. When they do, there will be a contract in place to make sure the recipient protects the data to the same standard as the EEA. This may include following international frameworks for making data sharing secure.

19

Sending data outside the EEA

This section tells you about the safeguards that keep your personal information safe and private, if its sent outside the EEA.

We will only send your data outside of the EEA to:

- Follow your instructions;
- Comply with a legal duty; and to
- Work with our suppliers who help us run your accounts and services.

We are based in the UK, if we do transfer your personal information outside the EEA, we will make sure that it's protected to the same extent as in the EEA. We'll use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA;
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA; or
- Transfer it to organisations that are part of Privacy Shield. This is a framework that sets privacy standards for data sent between the United States and European Union countries. It makes sure those standards are similar to what is used in the EEA.

Head Office

19 St Petersgate
Stockport,
Cheshire, SK1 1HF
Tel: 0161 429 6262
Email: info@thevernon.co.uk

Bramhall

12b Woodford Road
Bramhall,
Stockport, SK7 1JJ
Tel: 0161 429 4312
Email: bramhall@thevernon.co.uk

Hazel Grove

190 London Road
Hazel Grove,
Stockport, SK7 4HF
Tel: 0161 429 4313
Email: hazelgrove@thevernon.co.uk

Marple

1 Ridgedale Centre
Marple,
Stockport, SK6 6AW
Tel: 0161 429 4316
Email: marple@thevernon.co.uk

Poynton

87 Park Lane
Poynton,
Cheshire, SK12 1RD
Tel: 01625 855 830
Email: poynton@thevernon.co.uk

Reddish

4 Gorton Road,
Reddish,
Stockport, SK5 6AE
Tel: 0161 429 4315
Email: reddish@thevernon.co.uk



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