



Use of Information

Use of Your Personal Data

When you apply for an AA Savings Account, you will be asked to provide certain personal information. Your personal data in respect of this account (which will include details regarding your account) will be held by and shared between members of the Acromas group of companies (which includes AA Financial Services Limited (“the AA”) (“AA Group”) and Bank of Scotland Plc which trades as Birmingham Midshires (“Birmingham Midshires”, “we”, “us”, “our”), part of the Lloyds Banking Group. Birmingham Midshires and the AA will, in relation to any data that you submit when you apply for an AA Savings Account, share your personal information which they will process independently of each other for their own purposes including in connection with your account.

Birmingham Midshires is registered as a data controller (under the name of Bank of Scotland plc) with the Information Commissioner’s Office (“ICO”) under the terms of the Data Protection Act 1998 (“DPA”), with the registration number Z7828948. AA Financial Services Limited is registered as a data controller with the ICO with the registration number Z1904708.

Cookies and other Internet technologies are used to help provide online services. Please refer to the privacy and cookies policies on the websites you visit for further information.

This notice describes how your personal data provided or obtained in respect of your application and/or your account will be handled, disclosed, and protected by Birmingham Midshires and the AA and other members of the Lloyds Banking Group and the AA Group. The processing and disclosure of your personal data in respect of other products and services will be subject to the notices given in respect of those products and services. Please refer to such notices as relevant.

What personal information is collected?

Birmingham Midshires and the AA may collect and share with each other the following information in connection with any AA savings account:

- your full name and contact information (including home address, e-mail address, home telephone number and mobile telephone number) and any other contact details you provide to Birmingham Midshires or the AA, including any updates you provide or which we obtain from other sources;
- your age and date of birth;
- your country of residence and nationality;
- gender;
- employment status;
- details of any current AA savings accounts;
- financial information including source of wealth;
- personal information including the above categories of information of a third party (such as a joint applicant) which you provide to us or the AA with their consent in accordance with the “Joint Applicants” section below;
- information that you provide when you apply for an AA Savings Account; and
- records of any correspondence with you regarding any specific enquiry you make.

How Birmingham Midshires will use your Personal Data

Our Group

The Lloyds Banking Group includes Birmingham Midshires and a number of other companies using brands including Lloyds, Halifax and Bank of Scotland, and their associated companies. More information on the Group can be found at www.lloydsbankinggroup.com.



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Where we obtain your information

We collect and use information you provide when you apply for an AA Savings Account, and any additional information provided by you or others in your dealings with us, including

- (a) in applications, emails and letters and during telephone calls;
- (b) from analysis (for example, the amount frequency, location, origin, and recipient) of your payments and other transactions, and your use of services involving other Lloyds Banking Group companies and what they know from operating your account (if applicable); and
- (c) information Lloyds Banking Group companies receive from each other, from our business partners, and from other organisations such as credit reference agencies and fraud prevention agencies.

We will not retain your personal information for longer than is necessary for the maintenance your account, or for legal or regulatory requirements.

How we use and share your information

Your personal information will be made available to Birmingham Midshires' authorised service providers and third party suppliers which perform certain services on Birmingham Midshires' behalf e.g. providing IT support and maintenance services, hosting services and records and account management services. These service providers may have access to personal information needed to perform their functions on Birmingham Midshires' behalf but are not permitted to share or use such information for any other purpose, and are required to keep the information secure.

Birmingham Midshires may use the personal information we hold about you across the Lloyds Banking Group companies for the following activities:

- (a) providing you with and administering products and services you have requested, communicating with you regarding your account or our customer relationship with you and notifying you about important changes or developments to the features and operation of those products and services;
- (b) responding to your enquiries and complaints;
- (c) undertaking financial reviews;
- (d) internal record keeping;

and may also share the personal information we hold about you with other Lloyds Banking Group companies for the following activities:

- (e) updating, consolidating, and improving the accuracy of our records;
- (f) undertaking transactional analysis;
- (g) improving products and services;
- (h) testing new systems and checking upgrades to existing systems (we will remove identifying features where appropriate);
- (i) crime and fraud detection and prevention;
- (j) customer modelling, statistical and trend analysis, with the aim of developing and improving products and services; and
- (k) managing your relationship with the Lloyds Banking Group companies.

By sharing this information it enables us, and other companies in the Lloyds Banking Group, to better understand your needs and helps us to run your accounts in the efficient way that you expect.

Your data may also be used for other purposes for which you give your specific permission, or, in very limited circumstances, when required by law or where permitted under the terms of the DPA.

We will treat your personal information as private and confidential, but may share it with each other and disclose it outside the Lloyds Banking Group if:

- (a) set out in this privacy notice;



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- (b) you consent;
- (c) needed by our agents, advisers or others involved in running accounts and services for you or us, as set out above;
- (d) needed by subcontractors to help us manage your records, as set out above;
- (e) HM Revenue & Customs or other authorities require it;
- (f) the law, regulatory bodies, or the public interest permits or requires it;
- (g) required by us or others to investigate or prevent crime and fraud;
- (h) to any other parties connected with your account (including guarantors); or
- (i) required as part of our duty to protect your accounts, for example we are required to disclose your information to the UK Financial Services Compensation Scheme (FSCS).

Your personal information will be held securely in Lloyds Banking Group systems so that any other companies in our Group that you have dealings with, either now or in the future, can manage your relationship with us. We will always ensure your information remains safe and secure.

Sharing your information between the Lloyds Banking Group and the AA Group

Any personal information provided by the AA Group or you will be shared within the Lloyds Banking Group and with the AA Group of Companies so that both groups of companies can look after their respective relationships with you. By sharing this information it enables both companies to better understand your needs, run your accounts and provide products in the efficient way that you expect.

Using your information to help prevent terrorism and crime

The Government also requires us 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.

Sharing your information to assist with asset buying or selling

Lloyds Banking Group companies may in the future wish to sell, transfer or merge part or all of their business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it. If so, they 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 or for other purposes which they will notify you of (and will obtain your consent where appropriate).

Joint Applicants

If you provide personal information about someone else (such as a joint applicant) then you should not do so without their permission. By providing us with someone else's personal information you confirm that you have their consent to do so. Where information is provided by you about someone else, or someone discloses information about you, it may be added to any personal information that is already held by us and it will be used in the ways described in this privacy notice.

Sharing personal information between joint applicants



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Sometimes, when you open a joint account or product, this may mean that certain of your personal data will be shared with the other applicant. For example, transactions made by you will be seen by your joint account holder and vice versa.

Using companies to process your information outside the EEA

The personal information you provide to us is processed in the UK. It may be transferred to other members of the Lloyds Banking Group as described in previous paragraphs. Some of the companies to whom your personal information will be disclosed are located outside of the European Economic Area ("EEA"), in countries which do not provide the same level of protection to personal information. Birmingham Midshires (or our third party service providers) may run your accounts and provide other services from centres outside the EEA (such as the USA and India). We will take steps to ensure that your personal information will be afforded the level of protection required of us under applicable data protection legislation and this notice. Birmingham Midshires may process payments through other financial institutions such as banks and the worldwide payments system operated by the SWIFT organisation if, for example, you make a CHAPS payment or a foreign payment. Those external organisations may process and store your personal information abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism.

Using Fraud Prevention Agencies

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 will share your personal information from your application with fraud prevention agencies. If false or inaccurate information is provided and fraud is identified, details of this fraud will be passed to these 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 contact us in writing to Fraud Prevention Team, Birmingham Midshires, Pendeford Business Park, PO Box 81, Wolverhampton WV9 5HZ if you want to receive details of the relevant fraud prevention agencies. We and other organisations may access and use from other countries the information recorded by fraud prevention agencies.

How we check your identity

We may ask you to provide physical forms of identity verification when you open your account. Alternatively, we may search credit reference agency files in assessing your application. The agency also gives us other details and information from the Electoral Register to verify your identity. The agency keeps a record of our search, whether or not your application proceeds. Our search is not seen or used by lenders to assess your ability to obtain credit.

Undertaking Anti-Money Laundering checks

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 group companies within the Lloyds Banking Group. For more details about identity checks, please contact us.



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Recording phone calls

We and the AA may monitor or record phone calls with you in order to check we have carried out your instructions correctly, to resolve queries or issues, for regulatory purposes, to help improve the quality of service, and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes. We or the AA, as applicable, will notify you at the start of telephone calls where such calls may be monitored.

Obtaining a copy of your information

You may request details of personal information which Birmingham Midshires or members of Lloyds Banking Group hold about you under the DPA at any time and may request a copy of the information we hold about you. A small fee will be payable for this service, currently £10. If you wish to make such a request, please note that you will need to make a separate request and pay a separate fee in respect of each individual entity which holds your data. Please therefore make it clear on any request(s) which company in the Lloyds Banking Group your request is in respect of. If any information Birmingham Midshires has about you is inaccurate or incorrect, please let us know by post as soon as possible. We will correct it where appropriate. For further details on how to request a copy of your information, please contact Birmingham Midshires, Pendeford Business Park, PO Box 81, Wolverhampton WV9 5HZ.

Contacting you on your product maturity

To provide the best possible service, we will need to contact you shortly before the maturity of any fixed term or fixed rate products. This ensures that you can be made aware of the options available, and helps you make an informed decision about your maturity instructions.

Changes to Privacy Notice

We keep our privacy notice under regular review and we will notify you of any updates or changes and obtain your consent to any such changes where appropriate.

Further Information

For further information on this notice or if you have any questions, please contact Birmingham Midshires, Pendeford Business Park, PO Box 81, Wolverhampton WV9 5HZ

How the AA Group will use your Personal Data

The AA and other members of the AA Group will use your personal information for the following purposes:

- (a) to identify you when you contact the AA Group;
- (b) to give you a quote and assess which payment options the AA Group can offer you;
- (c) to help identify accounts, services and/or products which you could have from the AA Group or selected partners from time to time. The AA Group may do this by automatic means using a scoring system, which uses the information you have provided, any information the AA Group holds about you and information from third party agencies (including credit reference agencies who will keep a record of your enquiry);
- (d) to help administer, and contact you about improved administration of, any accounts, services and products the AA Group have provided before, or provide now or in the future;



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- (e) to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information;
- (f) to help to prevent and detect fraud or loss; and
- (g) to contact you in any way (including mail, email, telephone, text or multimedia messages) about products and services offered by us and/or selected partners unless you have previously asked us not to use the relevant personal data for such purposes.

The AA Group may allow other people and organisations to use information it holds about you for the purpose of providing services you have asked for, as part of the process of selling one or more of its businesses, or if the AA Group has been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings. From time to time, these service providers and organisations may be outside the European Economic Area in countries that do not have the same standards of protection for personal data as the UK. The AA Group will, however, always use every reasonable effort to ensure sufficient protections are in place to safeguard your personal information.

The AA Group may check your details with credit reference and fraud prevention agencies. If you provide false or inaccurate information and the AA Group suspects fraud, it will record this and details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. The AA Group and other organisations may access and use from other countries the information recorded by fraud prevention agencies. The AA Group and other organisations may use and search these credit reference and fraud prevention agencies records, for example, to:

- (a) help make decisions about credit related services for you and members of your household including assessing what quote and which payment options the AA Group can offer you for particular services;
- (b) help make decisions on motor, household, credit, life and other insurance proposals and insurance claims for you and other members of your household;
- (c) trace debtors, recover debt, prevent fraud, and to manage your accounts or insurance policies;
- (d) check your identity to prevent financial crime unless you give the AA Group other satisfactory proof of identity; and
- (e) check the details of job applicants and employees.

Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records will also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.

If you need details of those credit reference and fraud prevention agencies from which the AA Group obtains and with which it may record information about you, please write to The AA Data Protection Compliance Manager at The AA, Fanum House, Basing View, Basingstoke, Hampshire RG21 4EA.

Where you give the AA Group information on behalf of someone else, you confirm that you have provided them with the information set out in these provisions, and that they have not objected to such use of their personal information.



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In the event that the AA Group sells or buys any business or assets it may disclose your personal data to the prospective seller or buyer of such business or assets.

A list of companies forming the AA group of companies is available from The AA Data Protection Compliance Manager at the address above. See the AA privacy policy at theAA.com/termsandconditions/privacy_policy.html