

Home Buying Coach Application Privacy Notice

Who we are

The Home Buying Coach Application (“the App”) has been developed for Clydesdale Bank PLC by Life Moments Ltd. The App is owned and controlled by Clydesdale Bank PLC, which trades using the brands Virgin Money, Clydesdale Bank and Yorkshire Bank (“we”, “us”, “our”, “the Bank”).

Clydesdale Bank PLC is the data controller in respect of the personal data processed in the provision of the App services. This means that we are responsible for deciding how we hold and use your personal information. Our registered office address is 30 St Vincent Place, Glasgow, G1 2HL.

Any information collected by any of the third party websites referenced in the App will be controlled by the third party. Each third party will provide their own privacy notice.

The type of information we may hold about you and how we'll use it

When you download the App we will collect, store, and use the following categories of personal information about you:

- > **Personal details** (such as name, date of birth and email address).
- > **Device information** (such as device ID and IP address).
- > **Financial information*** (such as income and savings).
- > **Proposed property details***
- > **Application usage**

How is your personal information collected?

We will only collect personal information which you provide to us by using the App. We may, with your consent track your usage of the App using cookies. You can find out more about our use of cookies [here](#).

Why we need your information and what it is used for

Data Protection law requires us to have one or more reasons for using your information. These are the reasons we are relying in relation to the App:

- > **‘Contract performance’** – the information is needed to deliver the product or service.
- > **‘Consent’** – in some cases we may obtain your consent to use information in a particular way or where the law requires consent to be obtained. Whenever ‘consent’ is the only reason for us using the information you have the right to change your mind and change or withdraw your consent. You can do this from within the App.

Using your information

These are the main ways we'll use your information and why we do so:

- > Communicate with you, ensure you can sign into your account and track your progress towards your home buying goals across a variety of devices (contract performance, consent).

- > Understand where you are in the home buying journey (using cookies) and remember your preferences, so you'll be able to return to the last page you visited on the App. This will ensure you don't need to re-input detail you have previously provided to the App (contract performance).
- > Help you to plan and save for a deposit, based on your income and outgoings over your chosen timescale and help guide you on the purchase options available to you (contract performance).
- > Award Coach Credits and let you know how you can redeem them (consent).

*Where the legal basis we are relying on is contract performance we require your information in order to support you in your home buying journey. Without it the App will not work.

Data sharing

We may share your personal information within our group of companies, our partners, agents, suppliers and promoters to provide the service.

Data retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purpose we collected it. We may retain it longer in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

Using information outside the United Kingdom

In the provision of support services our service providers may have access to your information from outside the EEA, where data protection laws may not provide the same level of protection as those in the UK and the EEA.

In these cases we'll take all reasonable steps necessary to make sure your information is protected to UK standards. This may be through only allowing this from countries which the EU Commission has decided ensures an adequate level of protection for your information (an “adequacy decision”), or we have put in place our own measures to ensure adequate security as required by data protection law. These measures include having recognised safeguards, such as carrying out strict security checks, backed by strong contractual undertakings approved by the relevant regulators such as the EU style model clauses.

To find out more about the existence of an “adequacy decision” for that country or the safeguards we have put in place, please contact our Data Protection Officer on the details below.

Rights of access, correction, erasure, and restriction

Under certain circumstances, by law you have the right to:

- > Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- > Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

- > Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- > Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- > Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- > Request the transfer of your personal information to another party. To exercise any of these rights: You are able exercise your rights directly through the App, where you can manage and amend your own data preferences.

You can also exercise your rights by contacting us on 0345 850 2311 or visit <https://uk.virginmoney.com/contact/>

Data Protection Officer

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the best standards to protecting your personal information and comply with our responsibilities for data protection. Our DPO can be reached by email at CYBG.data.protection.officer.queries@cybg.com or by post at Group Data Protection Officer, Group Risk, Level 3, 51 West George Street, Glasgow G2 2JJ.

You have the right to make a complaint at any time to the [Information Commissioner's Office \(ICO\)](#), the UK supervisory authority for data protection issues.