# Online Banking & Mobile Banking App Privacy Policy



# About your personal data and Data Protection

In this Privacy Notice, "we" "us" and "our" refers to Tesco Personal Finance plc, trading as Tesco Bank and part of the Tesco Group (www.tescoplc.com/about-us). Under data protection laws, we're responsible for the personal data about you that we collect and use.

The details below tell you how we'll use the personal data you provide to us by using our Tesco Bank Online Banking (which includes our Mobile Banking App). This should be read alongside the Privacy Notice provided for the type of account you hold for more details.

By using our Online Banking or our Mobile Banking App you understand Tesco Bank will use your personal data in the ways described below and the ways explained in your account Privacy Notice which can be found on www.tescobank.com.

# What sort of data do we hold about you?

#### What the law says about processing

The law requires us to tell you how we process your personal data. "Processing" is a legal term but means anything we do with your personal data, such as collecting, gathering, obtaining, administering, adapting, sharing. keeping and deleting your personal data.

#### We collect and keep data about you

We collect details about you, your transactions and any personal data provided throughout your time as a Tesco Bank customer. This includes the personal data you give via our website or over the phone, information we get from third parties and information you submit when you register for our Online Banking and Mobile Banking App services. This personal data includes your name, address, email addresses and any emails, letters and telephone conversations.

#### When you visit our website

The information that we may collect and store will include any information you enter and submit on this website or Mobile Banking App, including your name, address, email addresses and any banking details or transactions.

We might also collect your IP address and other unique information to identify the device you're using to access Online Banking and our Mobile Banking App. This will be used for analysis purposes to help us understand how you use our website and our Mobile Banking App and to help us improve our service. We might also collect information from your device and Wi-Fi connection to assist us in making sure our Mobile Banking App is safe to use on your device and in detecting and preventing fraud (including mobile number, IMEI number, application and device logs including malware presence, root or jailbreak status and location). It will not be used to personally identify you, unless we suspect fraud.

# Using your location

By enabling location services you allow us to collect data which is used in our assessment of whether a transaction is unusual and may be fraudulent. This is done for your security and may shared with fraud agencies. We also collect some location data for analysis purposes, to help us to improve our service. If you don't wish us to collect and use your geolocation data in this way, you can turn off location service for the Mobile Banking App on your device. If you choose not to allow the Mobile Banking App to access location services we won't capture your location data. You can control access to location services at any time through your phone settings.

# Online Banking marketing messages

Within your Online Banking portal we're able to display Tesco Banking marketing offers to you based on your accounts with us, our marketing campaigns, as well as servicing messages. All marketing messages displayed online are not tailored to yourself through the use of profiling. You can find out more about Tesco Bank's wider direct marketing schemes and how you can manage your marketing preferences by viewing our full Privacy Notice at https://www.tescobank.com/help/privacy-and-cookies.

## We'll only ask for necessary personal data unless we tell you otherwise

We'll ask for personal data that is essential for us to know so that we can provide our products or services to you. If we ask for personal data that is not essential, we'll explain why and tell you the consequences if you do not provide us with the personal data.

#### How does Tesco Bank use your personal data?

Your personal data will be used to process and provide any service that you request from us. The security information you set up will be used to help prevent unauthorised or fraudulent use of your Online Banking or Mobile Banking App. You can find more detailed information on how Tesco Bank uses your personal data in your account-specific Privacy Notice and online at www.tescobank.com/help/privacy-and-cookies.

We may use your contact details (mobile phone or postal address) when we set up or register your security details to confirm your identity.

We may transfer and store your personal data outside the European Economic Area (EEA), but we'll ensure that appropriate security measures are taken. You can find more information on sending your personal data outside the EEA in your Product Privacy Notice and online at www.tescobank.com/help/privacy-and-cookies.

# Necessary uses - providing our products and services

#### We use your personal data to provide our service to you

To provide our services to you we will need to use your personal data, and any personal data that is connected with providing a particular product or service.

We'll need to use this personal data at all stages of our relationship with you, including:

- when you take out a product or service or require the use of one of our services
- during the time we have a relationship with you
- and for a period of time afterwards

The way we use the personal data about you and others include:

- verifying your identity and eligibility for products and services
- managing your accounts

#### It's necessary that we're able to use your personal data in this way

We can only provide our products or services if we can use your personal data in this way.

The law says we must ask for certain mandatory information, and make certain checks. Also, if you want to apply for our products or services, you must provide us with mandatory information.

# We also use your personal data for other 'legitimate business interests'

These are other uses allowed by law which are necessary to enable us to provide the products and services. These include:

- detecting and preventing fraud, other forms of financial crime, and other unlawful acts
- tracing and recovering debt
- managing and operating our business
- improving our business (see below)

## We may use your personal data to improve our business

The law allows us to use your personal data in reasonable ways to help us improve our business. The ways we might use your personal data to improve our business are to:

- understand customers' needs and requirements
- develop and test products and services
- carry out research and analysis on our products and services

When we use your personal data to improve our business, we always make sure we keep the amount of data we collect and use to an absolute minimum.

## Cookies and security tokens

Cookies are small data files that are downloaded onto your computer or device. Cookies are used for a number of different purposes. For example, some cookies are essential in order for your website or app visit to work whilst other cookies are used to help us understand how you use our website. For a detailed list of the different cookies in use please visit www.tescobank.com/help/privacy-and-cookies.

We use a SDK (software development kit) which is a tool coded into our Mobile Banking App that helps us understand how our services are being used and where and how we can make improvements.

If you use Online Banking or the Mobile Banking App we'll use a small file (a security token) which is similar to a cookie to identify trusted devices. This security token is only used when you login to Online Banking or the Mobile Banking App. To understand you rights in relation to the processing for your personal data, information can be found in your product Privacy Notice and also online at www.tescobank.com/help/privacy-and-cookies.

# Who do we share your personal data with?

#### Why we share your personal data

In order to provide our products and services to you, it is necessary for us to share information with third parties. We're required by law to share your personal data to prevent fraud and other forms of financial crime, to ensure that we're lending responsibly or to ensure that we're meeting our regulatory requirements.

#### We Tesco Bank will only share your personal data

- where we have your permission
- where the law says we must
- where sharing personal data meets the requirements of the data protection laws

Whenever we share data, we only share the amount necessary to achieve the objective of the sharing.

# How long do we keep your personal data for?

# We keep your personal data for a reasonable period only

How long we keep your personal data will depend on:

- what type of product or service we're providing for you
- how long laws or regulations say we must keep it
- what we need for fraud and other financial crime prevention
- what we need to lend responsibly
- other legitimate business reasons (for example because we need to respond to a complaint or legal claim)

#### How long do we keep data when you no longer use our services?

We keep your personal data once your account is closed or your insurance policies have lapsed for up to 10 years.

# Your Rights

You have the right to know what information we hold about you, and to tell us what information we can and cannot use. This is a short summary of your rights. Further information can be located in your account-specific Privacy Notice.

# Accurate information

If you think we have got something wrong about you, let us know so we can correct it.

#### See what information we hold about you

To request a copy of the information we hold, use the Subject Access Request Application Form located on our website.

#### Have your information in an easily-transferable digital format

You can ask us to send to you or another organisation the information that you have given us.

#### Restrict or stop the use of, or erase completely, your information

There are some restrictions to this, for example information we need in order to provide you with products or services, for where it's information the law says we must keep.

# Opt out of marketing, including profiling for marketing purposes

Do this by using the 'unsubscribe' option in emails, by changing your online account settings, or by contacting us.

#### **Automated Decisions**

You have rights related to automated decision-making. For more information about how we monitor automated decision-making, please contact us using the details set out below.

#### Withdraw your consent

Sometimes we need your consent to process your information. If you have given consent, you can change your mind and withdraw it (except for information the law says we can or must process).

# The Information Commissioner's Office

If you have a complaint or concern about how we have handled your information and we have not been able to sort it out to your satisfaction, you have the right to lodge a complaint with the ICO. Go to www.ico.org.uk.