



Privacy Notice

This notice is to let customers of NRAM Limited (“NRAM”) and NRAM (No.2) Limited (“NRAM No. 2” and together with NRAM, the “NRAM Group”) know how we use your personal information (also referred to as “personal data”). It also explains your privacy rights and how the law protects you.

Who we are

This notice applies to you because you have or formerly had a mortgage or loan with NRAM or NRAM No.2.

NRAM is authorised and regulated by the Financial Conduct Authority.

You can contact us regarding your privacy rights by writing to: Data Protection, NRAM Limited, PO BOX 118, Skipton, BD23 9FH.

The wider NRAM Group

NRAM and NRAM No.2 are directly owned by Jupiter Jersey Bidco Limited, part of the Davidson Kempner Capital Management LP group (the “DKCM Group”). Your data may be shared with other members of the DKCM Group as required so that we can deliver our services to you and manage our business effectively.

Our mortgage service providers

In administering your loans, all lender companies within the NRAM Group work closely with the NRAM Group’s service providers, Bradford & Bingley Limited, Homeloan Management Limited and Computershare Mortgage Services Limited (together, our “MSPs”), which are both part of the Computershare group of companies. This means that we share your personal data with our MSPs who, in turn, may share the information with other Computershare group companies (principally, Baseline Capital Limited, Computershare Technology Services (UK) Limited and

Computershare Investor Services PLC) which assist the MSPs in delivering services. It also means that some of the data which is collected from you may be collected by the MSPs on the relevant lender's behalf.

All data sharing with the MSPs is subject to strict confidentiality requirements, and your lender remains responsible for directing the ways in which the MSPs use your personal data. To the extent that each of NRAM and NRAM No.2 determine the manner and the purpose of processing, each acknowledges that it is a "data controller" (as defined under the General Data Protection Regulation (the "Regulation") as such Regulation is incorporated into the domestic laws of the United Kingdom) of your personal data. This includes in relation to the usage of your personal data by the MSPs when acting on behalf of the relevant lender.

In this Privacy Notice, the terms "we", "us" and "our" should be understood as meaning your lender. Where we talk about the things we will do in relation to your data, it may be that the action is taken on our behalf by another company within the NRAM Group; or by an MSP (or a company within the MSP's group).

The kinds of personal information we use

We use the following different kinds of personal information about you:

- Personal details such as your full name, current/previous addresses, nationality, length of residency in the UK, date of birth, telephone numbers, e-mail addresses and passport or National Insurance details;
- Details of your employment circumstances, financial details (such as information about your assets, liabilities, income and expenditure), credit history and any insolvency process to which you are subject;
- Your bank account details;
- Information passed on by Law Enforcement Agencies;
- Any information which you or a co-borrower provide to us regarding your family, lifestyle and other circumstances (provided always that the information is relevant to the administration of your account);
- Transactional details regarding your accounts with us; and
- We may sometimes collect data regarding your health in the course of administering your account. In addition, if you tell us 'sensitive' information regarding matters such as your sexual orientation or racial or ethnic origin, we may record it if it is relevant to managing your account. However, the law affords special protection to this type

of personal data (which is designated ‘**special category data**’) and we will only collect it where we have a good reason to do so and where we have your explicit consent or where the law otherwise allows. **You may withdraw your consent to our holding this special category data and require us to delete it at any time. (See below under ‘Your Rights’).**

Where we obtain your data from

Much of the personal data we collect will come (or will already have come) directly from you – either as part of your loan application process, or, when you communicate with us during the course of your relationship with us. We will also generate payment and transaction data as a function of administering your loan, and we will sometimes derive additional data through analysis of that information.

Where your mortgage has been transferred to us from another lender, we have obtained your information from that lender.

Where you have taken out a loan jointly with another person, or if you are a director of a corporate borrower, we may have obtained your personal information from a co-borrower or a fellow director. If you have not authorised the relevant co-borrower or co-director to provide your personal information to us, please let us know. **Please do not provide us with personal information about anyone else (including a joint borrower) unless you have their consent to do so.**

We sometimes also obtain data from the following third parties, with whom we work:

- asset managers, field agents and Law of Property receivers;
- Credit Reference Agencies;
- fraud prevention agencies; and
- law enforcement agencies or government agencies.

In addition, we may also collect information about you which can be obtained via open data sources and public records (e.g. the electoral register, Companies House (where you are a director of a corporate customer) and information openly available via the internet), although we will only do this where it is necessary for the performance of the loan contract (e.g. to help us trace you where you have moved house) or where we have a legitimate interest in doing so to enable us to administer your

loan or to collect debts which we are owed. (See further under the section “How the law protects you” (below) regarding the grounds on which we use your data).

We also process certain information relating to former customers of NRAM plc (now known as Landmark Mortgages Limited), a former subsidiary of NRAM Limited, where such customers have redeemed their mortgage account prior to 18 July 2016.

How we use your data

We use your personal information in the following ways:

- to deliver our services to you and manage our business relationship with you;
- to identify you when you contact us;
- to manage your payments;
- to administer your account (including managing fees, charges, interest and other transactions on the account; and collecting payments which have become due. Payment collection may involve reviewing your account/personal data and contacting you to arrange payment or to discuss your situation);
- to detect, report, and prevent money laundering and financial crime;
- to obey laws and regulations which apply to us;
- to respond to enquiries and complaints which you make;
- to contact you where we need to inform you of changes to the way in which we administer your account, or to remind you of issues relating to the account;
- to meet contractual obligations which we have to third parties in connection with the administration of your account;
- to manage our business in an efficient and proper manner, including the management of our financial position, our resources, the risks to which we are exposed (including lending and insurance risks) and the way in which we arrange our internal operations; and
- to undertake customer modelling, statistical analysis and trend analysis with the aim of improving our services.

How the law protects you

The Regulation says that we may only use your personal data where we have one or more legitimate reasons (or grounds) for doing so. The grounds on which we use your data are as follows:

- **because you have explicitly consented to a specific use of your data.** This applies in relation to any “special categories” of data which we collect from you. (“Special category” data is sensitive information relating to matters such as health issues, sex life or sexual orientation, which are given special protection under the law). You may withdraw your consent at any time;
- **because it is necessary to comply with a legal obligation.** This applies to circumstances where we disclose your information to a public body (such as the police) or a private person (such as a Trustee in Bankruptcy) who is empowered to demand that we provide it. It also applies to our identity verification checks and account monitoring activity (including call recording), which is needed in order to comply with financial crime legislation and in order to meet financial regulation;
- **because it is necessary for the purposes of our own legitimate interests.** This applies to many of the ways in which we use your data. It also applies to ‘higher level’ activities, such as undertaking reviews, analysis and reports (including the production of financial and statistical information) which are undertaken as part of our legitimate interest in arranging the sound internal management and governance of our business. It also applies to circumstances where we disclose your data to:
 - a third party (such as a regulator or joint borrower) because we need to do so to defend our rights or standing;
 - credit reference agencies and fraud prevention agencies in connection with a contract variation application: see Appendix for further details;
 - credit reference agencies as part of ongoing payment performance reporting – in accordance with our legitimate interests in maintaining membership of the credit reporting community;
 - a company (including our MSPs) to whom we have outsourced the delivery of some or all of our services (in accordance with our legitimate interest in managing our business efficiently);
 - our auditors/accountants, legal advisors and other parties which provide a service to us;

- anyone who takes, or is considering taking, a transfer, assignment, charge or other disposal of all or part of our interest in your mortgage, or who takes, or is considering taking, a transfer of all or some of our obligations under the mortgage.
- UK Asset Resolution Limited (“UKAR”), the former parent company of NRAM, where UKAR has assumed a legal obligation in place of the NRAM Group and requires your data in order to comply with such legal obligation.
- anyone who has taken a beneficial interest in your mortgage.

Third parties with whom we share your data

We may share your data with the following recipients:

- Companies to whom we outsource the delivery of some or all of our services (including our MSPs / MSP group companies, and our IT provider, Computershare Mortgage Services Limited), and companies to whom our MSPs outsource delivery of services;
- Banks and payment card service providers, who assist us to collect payments from you;
- UKAR (as detailed above);
- Agents acting on our behalf to assist in managing the account or collecting money owed (e.g. field agents, tracing agents, property valuers, Law of Property Act receivers (who are appointed by us but legally act as your agent) and asset managers);
- Credit reference agencies and fraud prevention agencies (to add you as a party to an existing loan held by someone else);
- Credit reference agencies as part of ongoing payment performance reporting;
- Law enforcement agencies where fraud is suspected;
- Our insurers;
- Regulators (such as the Financial Conduct Authority, the Financial Ombudsman Service and the Information Commissioner) where they have asked for information or it is reasonable for us to provide it in defence of our position;
- The Financial Services Compensation Scheme, where they require the information;
- Public bodies (such as HMRC or a local council); and private persons (such as a Trustee in Bankruptcy) who are empowered in law to require us to provide the information;

- Joint borrowers* and guarantors on your account; and third parties with whom you have authorised us to communicate (including where you appoint a debt management company);

*Note: where you inform us of a dispute with your co-borrower, and ask us not to disclose your personal data to them, we will reduce any disclosures to the minimum required for the purposes of administering the account or protecting our legitimate interests;

- Solicitors who act on our behalf;
- Our auditors/accountants and other professional services firms which we may engage to undertake work for us (on the basis that they keep your personal data confidential);
- Third parties who assert rights in relation to our security property, where such disclosure is necessary to defend our legal rights, or where they are entitled to the information as a result of an established interest in your property;
- Anyone who takes, or is considering taking, a transfer, assignment, charge or other disposal of all or part of our interest in your mortgage, or who takes, or is considering taking, a transfer of all or some of our obligations under the mortgage; and
- Anyone who has taken a beneficial interest in your mortgage.

Transfers outside of the United Kingdom (“UK”)

It may be that in order to deliver our services to you and manage our business effectively it is necessary to transfer your data outside of the UK.

To address the risks which this presents, the relevant recipients are (or, for future transfers of data, will be) placed under strict contractual duties regarding the confidentiality of all customer information, meaning they are obliged to ensure that all personal data is processed in the same way as if it was being processed inside the UK.

Retention periods

All information will be retained for as long as you are our customer. When you are no longer a customer we will keep your data only for as long as it is needed to comply with the legal and regulatory requirements to which we are subject or needed to address complaints or legal claims which may be made against us. This will not usually exceed 15 years from the date when your loan is repaid.

Your rights

Subject to any overriding legal obligations, requirements and/or exemptions, you have the right to:

- withdraw your consent to the use of your personal data, where that use is undertaken on the grounds of consent (see above);
- object to our processing of your personal data where it is based exclusively on our legitimate interests (see above) or for marketing purposes;
- request that we cease processing your personal data for the purposes of automated decision making;
- ask us to correct incorrect personal data which we may hold about you;
- request the erasure of personal data where it is no longer necessary for the purpose(s) for which it was originally collected; and
- obtain a copy of your personal data.

To exercise these rights, please write to: Data Protection, NRAM Limited, PO BOX 118, Skipton, BD23 9FH. See www.nram.co.uk for more details. Please note that we may ask you to provide a form of identification verification before we can give effect to any such request made by you.

How to make a complaint

Wherever possible, if you have a complaint about our data processing activities, we would like to work with you to resolve this. If you have a complaint please write to us at NRAM Limited, PO BOX 118, Skipton, BD23 9FH. See www.nram.co.uk for more information about how to complain.

You may also make a complaint about our data processing activities to a supervisory authority. For the UK, this is the Information Commissioner's Office at www.ico.org.uk.