



Charter Court
Financial Services Group plc

Privacy Notice for Shareholders

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Charter Court Financial Services Group plc is the group holding company of the Charter Court Group of companies which is made up of Charter Court Financial Services Group plc and its subsidiary companies Charter Court Financial Services Limited, Charter Mortgages Limited, Exact Mortgage Experts Limited and Broadlands Finance Limited.

Charter Court Financial Services Group plc will be a data controller of any personal data it holds about you and the shares you hold in it. We may share this information with other parts of the Charter Court Group. Where this occurs, they will be a separate data controller in respect of that personal data, and this privacy notice will also apply to any processing they undertake, unless they provide you with an alternative privacy notice.

A data controller is an individual or organisation which decides how your personal data will be used. The data controller is referred to as "we", "us" and "our" in this privacy notice.

If you require any further information or wish to contact us or our Data Protection Officer at any time our contact details are:

Address: Charter Court Financial Services Group plc
2 Charter Court
Broadlands
Wolverhampton
WV10 6TD

Telephone number: 0800 032 9999

DPO Email: thedataprotectionofficer@chartercourtfsc.co.uk

Who this privacy notice applies to

This privacy notice explains how we will use the personal data of:

- a shareholder (who is a natural person);
- a representative of a shareholder (who is a natural person), and
- a representative of a shareholder (which is a corporate body, trust or charity).

Each such person will be referred to as "you" and "your" in this privacy notice.

Why we are providing you with this privacy notice

Applicable Data Protection laws (including the General Data Protection Regulations 2016 and the Data Protection Act 2018), impose obligations on us as the data controller, when we collect or create, hold, amend, disclose, share or otherwise use or erase/destroy (collectively referred to as processing) your personal data and give you, as the data subject, rights over your personal data.

One such obligation is to process, (e.g. collect, hold, use, erase) your personal data, fairly, lawfully and in a transparent manner. This privacy notice meets that obligation by explaining what personal data we will hold about you, how we will process your personal data, why we process your personal data and the lawful grounds on which we are processing it. It also sets out some of your legal rights.

We may change this privacy notice in the future. If we make any substantial and/or material changes and those changes materially affect you we will inform you of any changes before they take effect.

How we obtain your personal data

We will mainly receive personal data about you from you; however, we may also receive it from other sources including from persons who represent or advise you including a person appointed under a power of attorney. We will also collect and create personal data about you whilst you remain a shareholder. We may also obtain data about you that is publicly available such as from the Electoral Register, the internet, Companies House and the Land Registry.

The types of personal data we will have about you

We may process a wide variety of data about you, where necessary, for the purposes set out in the "How We Will Use Your Data" section, including data about:

you as a natural person who is a shareholder (and where appropriate) you as a natural person who is a representative of either: (a) a shareholder which is a corporate body (b) a shareholder which is a natural person	<ul style="list-style-type: none">• name, title and address (including previous names and addresses)• other contact details including email addresses and telephone numbers
people connected to you	<ul style="list-style-type: none">• your advisers and representatives• their address and telephone numbers
your finances (shareholders who are natural persons only)	<ul style="list-style-type: none">• your bank account details (account number and sort code) including payments to and from your accounts
your share account with us (shareholders who are natural persons only)	<ul style="list-style-type: none">• reference number we attribute to you• the votes you cast• the number of shares you hold
your preferences	<ul style="list-style-type: none">• whether you prefer information in alternative formats e.g. braille or large print
your technology	<ul style="list-style-type: none">• device identifiers including IP address
your correspondence and documents we hold	<ul style="list-style-type: none">• documents we hold, correspondence or communications received or sent and the information contained within them

Special Category Data

Some personal data for example data about your health, racial or ethnic origin is subject to additional rights and are described as special category data. We will not normally ask for or record this special category data but we may ask for and record details about your health if it is necessary and relevant for the management of the account (e.g. so we can make reasonable adjustments to assist you in managing your relationship with us, which may include sending you information in braille or large print, or if we think you are experiencing circumstances which may lead you to be financially or otherwise vulnerable).

We will only do this if you have confirmed your consent to us doing so, or where we are legally permitted or required to process this information without seeking your consent. You are not contractually required to provide this information, and where we have obtained your consent to us processing special category data in this way, you are entitled to withdraw your consent to this at any time. Please contact us if you wish to do so but that may affect our ability to manage your account in the most appropriate way for you. If you withdraw your consent, we will not continue to process this information for those purposes, but it will not impact the validity of any processing undertaken before you withdrew your consent.

How we will use your data

We will use your personal data to:

<p>manage our relationship with you and to administer the shares you have with us</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • verify your identity • contact you about your shares • compile and update our records • process the rights you exercise as a shareholder • provide you with information regarding our business operations • provide you with online access • provide you with annual reports, circulars, notices and other relevant documents in your capacity as a shareholder • offer benefits in your capacity as a shareholder • pay dividends and issue securities; • process any payments related to our services requested by you • locate you if we reasonably believe you are no longer living at the most recent address we have for you
<p>identify and prevent financial crime</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • detect, prevent, investigate and/or report suspected money laundering, fraud, bribery, corruption and other crime
<p>comply with our legal, contractual and regulatory obligations, codes of practice and to run our business</p>	<p>this will include to:</p> <ul style="list-style-type: none"> • identify if you, a close associate or relative are subject to financial sanctions or are considered politically exposed • provide data, reports and returns to the London Stock Exchange, our regulators, other statutory bodies, our trade bodies or when required by a court order or other legal or contractual obligation • manage, monitor, analyse, develop, forecast and report on the performance of our businesses, suppliers and other third parties including accounting and auditing • manage risk for us and our customers • seek advice from our advisers • share your data with any person or organisation who does, or who we believe wishes to, enter into an acquisition of our business or who does or wishes to fund or otherwise be involved in such an acquisition, their advisers and representatives • comply with any other legal obligation imposed on us, including where you have sought to exercise your legal rights
<p>Develop and improve our services</p>	<p>this will include to</p> <ul style="list-style-type: none"> • test services • obtain your feedback on the services we provide • undertake market research • ensure that we meet high standards of customer service, including monitoring calls and training staff

Undertake analysis	this will include to : <ul style="list-style-type: none"> to conduct research for internal statistical analysis and analysis of shareholder patterns and choices contact you for direct marketing purposes about products and services we think will be of interest to you, including those offered by us, and our other business partners, and facilitating competitions and promotions
investigate and respond to complaints, disputes and where necessary to bring or defend legal claims	this will include to : <ul style="list-style-type: none"> identify and document facts and evidence investigate and respond to complaints, disputes, regulatory investigations and/or to bring or defend legal claims allow us to ensure that we offer the highest standard of customer service, by identifying if we have provided any inadequate service and the causes of such failings, and to determine how to avoid any repeat of that situation and improving our services.

Call recording

We will record and/or monitor telephone calls with you for the following purposes:

- for security, quality and/or training purposes;
- to confirm that we have complied with your instructions;
- to resolve or investigate any queries;
- to comply with our legal obligations, and
- to prevent fraud or other criminal activities.

The legal grounds on which we will process your data

We will only process your personal data if we have a reason to do so that is legally permitted. When using your personal data for the purposes listed above we are relying on one or more of the following legal reasons for processing that data:

- the purpose is necessary for the performance of a contract with you or, if you asked us to, to enable us to enter into a contract with you;
- the purpose is necessary for us to comply with our legal obligations;
- the purpose is necessary for our legitimate interests, or
- if you have consented to us processing personal data for one or more specified purposes.

The legitimate interests we have for processing your personal data as described above include to:

- comply with our legal and contractual obligations, best practice and codes of practice;
- exercise our legal rights;
- prevent financial and other crime;
- meet your expectations of us;
- enhance and develop the services we provide to you;
- develop and improve our business, services and the terms which apply to them;
- undertake analysis, modelling and forecasting;

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- manage and mitigate the risks to you and our business;
 - keep our records up to date and to enable us to link your different accounts with us together;
 - verify the information provided to us to ensure its accuracy;
 - be efficient in running our business, providing our services, fulfilling our legal obligations and meeting expectations of us, and
 - ensure our business is profitable and has adequate levels of capital and funding to facilitate investment in, and the growth of, our business.

Any special category data will only be processed where it is necessary and only:

- with your prior explicit consent;
- where permitted by law to protect your well-being, or
- for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Who we share your data with

We may share your personal data with other companies within the Charter Court Group and with:

- you, your representatives, attorneys and advisers;
- our suppliers, service providers, professional advisers, agents and auditors including those which administer our share register on our behalf;
- potential suppliers, service providers and professional advisers;
- any third party at your request or with your consent;
- courts, tribunals, arbitrators and other persons operating in a similar capacity if the law requires or permits disclosure;
- your and our insurers;
- your bank and building society;
- your personal representatives;
- your company;
- our bank, BACS and the Direct Debit Scheme;
- statutory and regulatory bodies including the London Stock Exchange, tax authorities, HMRC, Companies House, Benefits Agency, Information Commissioner's Office, Prudential Regulation Authority, Financial Conduct Authority, European Central Bank and Bank of England;
- law enforcement agencies;
- any investor, potential investor, funder, purchaser in or of our business or any part of our business and their advisers, and
- any business with which we are seeking to merge and their advisers.

How long we will hold your data for

We will usually keep your personal data for 7 years from the date on which you cease to be a shareholder. We may retain the data for longer where it is necessary for us to do so to meet our legal or regulatory obligations.

If you choose not to give us personal data

Where you will be a shareholder, you will need to provide us with the personal data we request to enable us to administer your share account.

If you don't give us the information we request, then it may prevent us from being able to respond to your request to provide the service to you. It may also affect our ability to meet our contractual or legal obligations.

Your legal rights

You have a number of rights over your personal data processed by us. These include your rights to request:

- [access to your personal data](#). You may request a copy of the personal data that we hold about you.
- [accuracy of your personal data](#). You may request that we correct incomplete, inaccurate or outdated personal data. We take sensible steps to make sure that personal data is accurate, complete, and current. You can help us do this by notifying us of any changes to your personal data.
- [transmission of personal data](#). You may request that we transfer personal data you have provided to us to you or to another person.
- [erasure of personal data](#). You may request that we delete your personal data.
- [that the processing of your personal data be restricted](#). You may request that our use of your personal data ends, is restricted or limited.

The extent of these rights are limited by law and we may not act on part or all of your request(s) where the right(s) are not applicable. If we do not act on your request we will explain our reasons for not doing so when responding to your request.

If you require any further information about how we handle your personal data or wish to make a request to exercise any of your rights under data protection laws, please contact our Data Protection Officer.

Sending your personal data outside the European Union

Your personal data may be processed or transferred outside the United Kingdom and European Union.

If you require further information as to where your personal data is transferred to, and the measures we have implemented to safeguard that information, please contact our Data Protection Officer.

How to complain

If you are unhappy with the outcome of any of your requests to exercise your rights, or how we handle your personal data then please let us know.

You are also entitled to complain to the Information Commissioner's Office:

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone number: 0303 123 1113

Email: Casework@ico.org.uk