

# Data Privacy Notice

## Purpose and legal basis for processing

We collect and process personal data - including special category data where relevant - in line with our legal, regulatory and statutory obligations to investigate Speak Out whistleblowing reports and to take remedial action.

## What information we collect

When a report is submitted, we create a case file that may include:

- Details of the concern
- Identities, contact details and other relevant information of individuals involved (although the reporter may choose to remain anonymous)
- Any supporting evidence provided

in some cases this may include Special Category data, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

We only collect what is necessary to investigate the concern.

## Why we need this information

- We need sufficient detail to:
  - Understand the nature of the concern
  - Conduct a fair and thorough investigation
  - Determine and implement any necessary actions

## How we use and share this information

All information is treated as confidential. If we need to share personal data with a third party to support the investigation, we will require them to meet strict standards of security and confidentiality.

Where possible, we'll provide feedback to the reporter. However, this may be limited due to confidentiality or legal constraints.

We also compile anonymised statistics for reporting to the Society's Board which do not identify individuals.

## Our data processors

For reports submitted via Safecall UK, Safecall UK is the data processor and the Society is the data controller.

If the reporter chooses to provide their identity to Safecall, but asks that it not be shared with Skipton, Safecall becomes the Data Controller for that specific information.

For more on how Safecall UK processes personal data, please see their privacy policy <https://www.safecall.co.uk/en/privacy-policy-whistleblowing/>

## Data retention

We retain personal data only as long as necessary. Although this depends on what the report is about, typically:

- Personal data is anonymised within 12 months of completing an investigation
- Case details may be retained for up to 7 years.

## Your rights

Under data protection law, you have the right to:

- access and obtain a copy of your personal data,
- request correction of inaccurate or incomplete personal data,
- request deletion of your personal data (subject to our legal obligations)
- request restriction of processing of your personal data in certain circumstances.

## Contact Us:

If you have questions about how we handle personal data relating to Speak Out whistleblowing concerns, or you believe there has been a data breach, please contact:

- Data Protection Officer, [DPO@skipton.co.uk](mailto:DPO@skipton.co.uk)
- Group Secretary and General Counsel, [secretariat@skipton.co.uk](mailto:secretariat@skipton.co.uk)

You can also contact the Information Commissioner's Office (ICO), at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone 0303 123 1113, website <https://ico.org.uk>.

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