

# Colleague Privacy Notice

**Your Personal Information  
and what we do with it.**

**April 2026**



**West Brom**  
Building Society

Public

# Privacy Notice

## Colleagues

### Your personal information and what we do with it

The meaning of some terms that we use in this privacy notice:

Process or processing includes everything we do with your personal information from its collection, right through to its destruction or deletion when we no longer need it. This includes for instance collecting it (from you), obtaining it (from other organisations), using, sharing, storing, retaining, deleting, destroying, transferring it overseas.

Legitimate interests is mentioned in our privacy notice because data protection laws allow the processing of personal information where the purpose is legitimate and is not outweighed by your interests, fundamental rights and freedoms. Those laws call this the legitimate interests legal ground for personal data processing.

### Who we are and how to contact us and our Data Protection Officer (DPO)

West Bromwich Building Society of 2 Providence Place, West Bromwich B70 8AF, is a data controller of your personal information. This means information that is about you or from which you can be identified. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our relationship with you we decide how and why it is processed in the ways explained in this privacy notice. When we use terms such as we, us and our in this notice, we mean West Bromwich Building Society.

Our Data Protection Officer can be contacted at any time including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it by using the below details:

Data Protection Officer  
West Bromwich Building Society 2 Providence  
Place  
West Bromwich  
B70 8AF

Or email: [GDPR@westbrom.co.uk](mailto:GDPR@westbrom.co.uk)

You will see at the end of this privacy notice that we mention the privacy notices of Fraud Prevention Agencies and Credit Reference Agencies. We do need to share these with you. Please read them carefully and contact those organisations if you have questions (their details are in their notices).

This privacy notice may be updated from time to time. You should check the Society's intranet or the webpage [www.westbrom.co.uk/staff-privacy-notice](http://www.westbrom.co.uk/staff-privacy-notice) regularly so that you can read the up to date version.

### What kinds of personal information about you do we process?

This includes:

- Your title, full name, your contact details, including for instance your home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address);
- Your date of birth and/or age and national insurance number;
- Your nationality, if this is necessary for us to comply with our legal and regulatory requirements;
- Personal information which we obtain from Fraud Prevention Agencies (see the section on 'Fraud Prevention Agencies' on page 5);
- Some special categories of personal data such as about your health, racial or ethnic origins, religion, socio-economic background information and trade union membership;
- Details of any criminal convictions you have told us about;
- Your financial details e.g. your salary and bank account details;
- Personal information about your credit history which we obtain from Credit Reference Agencies;
- Your performance at work;
- Information which is relevant for your residency and/or citizenship status, such as your nationality, your length of residency in the UK and/or whether you have the permanent right to reside in UK;
- Employment and education history including qualifications;

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- Details of any secondary employment, conflict of interest or hospitality declarations;
- Your marital status, sexual orientation and gender;
- Details relating to family leave and pay, and parental/carer responsibilities. This includes forms applying for the relevant leave, copies of MATB1 forms/matching certificates and any other relevant documentation relating to the nature of the leave you will be taking;
- Information about your job role and your employment contract including your start and leave dates, salary (including grade and salary band), any changes to your employment contract, working pattern (including any requests for flexible working);
- Details of your time spent working and any overtime, expenses or other payments claimed, including details of any loans such as for travel season tickets;
- Details of any leave including sick leave, holidays, special leave etc.;
- Pension details including membership of both state and occupational pension schemes (current and previous);
- Information related to your training history and development needs;
- Your image such as your photograph taken for identification purposes and CCTV or video for mystery shopping and training purposes;
- Information derived from monitoring IT acceptable use standards;
- Health and wellbeing information either declared by you or obtained from health checks, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires or fit notes i.e. Statement of Fitness for Work;
- Accident records if you have an accident while at work; and
- Photos or videos of you may be taken during events held by the Society for both publication/promotional and social media purposes.

## What is the source of your personal information?

We will generally collect your personal information from you directly.

In addition, we obtain your personal information from other sources such as Fraud Prevention Agencies, Credit Reference Agencies (CRAs), HM Revenue and Customs (HMRC), Department of Work and Pensions (DWP), publicly available directories and information (e.g. telephone directory, news articles), debt recovery and/or tracing agents, other organisations to assist in prevention and detection of crime, police and law enforcement agencies.

We will also collect information from your previous employer, employment agency and referees during the recruitment process.

## What are the legal grounds for our processing of your personal information (including when we share it with others)?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to us:

- 1) Processing necessary to perform our contract with you (for entering into employment or for taking steps prior to entering into it):
  - a) Administering and managing your employment and updating your records.
- 2) Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations (who we list below), as follows:
  - a) Administering and managing your employment and updating your records;
  - b) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner's Office;
  - c) For management and audit of our business operations including accounting;
  - d) To carry out searches at Credit Reference Agencies pre-engagement, at the employment stage, and periodically

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after that;

- e) To carry out monitoring and to keep records;
  - f) Using staff information to conduct strategic analysis, modeling and forecasting to help the Society plan ahead;
  - g) Operating and keeping a record of employee performance and related processes to plan for career development, succession planning and workforce management purposes;
  - h) All of our IT systems and our access system for the entry and exit of our premises are auditable and can be monitored. We are committed to respecting individual users' reasonable expectations of privacy concerning the use of our IT systems and equipment. However, we reserve the right to log and monitor such use in line with Acceptable Use Standards. Any targeted monitoring of staff will take place within the context of our disciplinary procedures;
  - i) To administer our good governance requirements and those of other members of our Group; and
  - j) When we share your personal information with these other people or organisations:
    - Your next of kin;
    - Members of our Group;
    - Our legal and other professional advisers, auditors and actuaries;
    - Governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner's Office;
    - Tax authorities who are overseas for instance if you are subject to tax in another jurisdiction we may share your personal information directly with relevant tax authorities overseas (instead of via HMRC);
    - Pension providers and organisations which provide you with other benefits as a result of your employment;
    - Other organisations and businesses who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
    - Credit Reference Agencies.
- 3) Processing necessary to comply with our legal obligations:
- a) For compliance with laws that apply to us;
  - b) For establishment, defence and enforcement of our legal rights or those of any other member of our Group;
  - c) For activities relating to the prevention, detection and investigation of crime;
  - d) To carry out identity checks, anti-money laundering checks, and checks with Fraud Prevention Agencies pre-engagement, at the employment stage, and periodically after that.
  - e) To carry out monitoring and to keep records (see page 6);
  - f) To deal with requests from you to exercise your rights under data protection laws;
  - g) To process information about a crime or offence and proceedings related to that (in practice this will be relevant if we know or suspect fraud); and
  - h) When we share your personal information with these other people or organisations:
    - Your next of kin;
    - Fraud Prevention Agencies;
    - Pension providers and organisations which provide you with other benefits as a result of your employment;
    - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Financial Conduct Authority, the Prudential Regulation Authority, the Financial Ombudsman Service and the Information Commissioner's Office; and
    - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
- 4) Processing with your consent:
- a) When you request that we share your personal information with someone else;
  - b) For some of our processing of special categories of personal data such as about your health (and it will be explained to you when we ask for that explicit consent what purposes, sharing and use it is for).

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- 5) Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:
    - a) Processing of your special categories of personal data such as about your health; and
    - b) Processing that we need to do to fulfil our legal obligations and regulatory requirements.

### **How and when can you withdraw your consent?**

Much of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us using the details on page 2. The consequence might be that we cannot take into account special categories of personal data such as about your health (but these outcomes will be relevant only in cases where we rely on explicit consent for this).

### **Is your personal information transferred outside the UK?**

We may transfer your personal information to one of our suppliers outside the UK, but only where adequate protection measures are in place in compliance with data protection laws. For example, transfers of your personal information to the EU/EEA are permitted under the EU's UK GDPR adequacy decision. For transfers to countries without an adequacy decision, we will safeguard your personal information by putting in place data transfer agreements based on the applicable Standard Contractual Clauses and/or make use of other appropriate data transfer mechanisms. We will further protect your personal information by always using encryption methods whereby such information is converted into a code only readable by the organisation to which it is sent.

### **Cookies**

We use cookies on our website. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookies Policy here: [www.westbrom.co.uk/privacy-and-security-centre/cookies](http://www.westbrom.co.uk/privacy-and-security-centre/cookies).

### **Artificial Intelligence (AI)**

We and our third parties may use AI in our processing of personal data, this may be used to streamline processes and enhance your customer experience. Any use of AI will not be used for wider public AI learning and will remain within the control of us or our third parties. We will not use AI to make fully automated decisions. See the Profiling and other automated decision-making section below for other uses of AI.

### **How do we share your information with Fraud Prevention Agencies?**

The personal information we have collected from you will be shared with Fraud Prevention Agencies who will use it to prevent fraud and money laundering and to verify your identity. If fraud is detected, you could be refused certain services and/or finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights can be found by visiting [www.cifas.org.uk/fpn](http://www.cifas.org.uk/fpn) or by contacting [dpo@synectics-solutions.com](mailto:dpo@synectics-solutions.com) or West Bromwich Building Society at the address on page 2.

### **What should you do if your personal information changes?**

You should tell us without delay so that we can update our records. During your period of employment with the Society, you should inform the human Resources team of these changes. Under all other circumstances, the contact details for this purpose are: Data Protection Officer, West Bromwich Building Society, 2 Providence Place, West Bromwich, B70 8AF.

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## Do you have to provide your personal information to us?

We are unable to provide you with employment or to process any application without having personal information about you. Your personal information is required before you can be employed by us, or it is required during the life of that employment, or it is required by laws that apply to us.

## Do we do any monitoring involving processing of your personal information?

In this section monitoring means any listening to, recording of, viewing of, intercepting of, or taking and keeping records (as the case may be) of calls, emails, internet usage, text messages, social media messages, in face to face conversations and other communications.

We may monitor where permitted by law and we will do this where the law requires it. In particular, where we are required by the Financial Conduct Authority's regulatory regime to record certain telephone lines or in face to face conversations (as relevant) we will do so.

Some of our monitoring may be to comply with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communications systems and procedures, to have a record of what we have discussed with you and actions agreed with you, to have a record of what you have discussed with our customers, to protect you and to provide security for you and for quality control and training purposes.

Some of our monitoring may check for obscene or profane content in communications.

We may conduct carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with our legal obligations. For instance, where we suspect fraud, money laundering or other crimes.

Telephone calls and/or in face to face conversations between us and you may be recorded to make sure that we have a record of what has been discussed. We may also record these types of calls for quality control and training purposes.

## How long is your personal information retained by us?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- Retention in case of queries. We will retain the personal information that we need to keep in case of queries from you (for instance, if you apply unsuccessfully for a position) for 12 months unless we have to keep it for a longer period;
- Retention after employment. We will retain the personal information that we need to keep for 7 years after the relevant employment you have with us has come to an end unless we have to keep it for a longer period (see directly below); and
- Retention in case of claims. Where your employment with us terminated due to, for example, gross misconduct or any other reason that may result in a legal claim, we may retain the personal information that we need to keep even after the relevant employment has come to an end and 7 years have elapsed.

If you would like further information about our data retention practices, contact our Data Protection Officer.

## What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them, we will explain at that time if they apply.

- The right to be informed – we have to be transparent with you about the processing that we do with your personal information. This is why we have a privacy notice.
- The right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed in certain circumstances.
- The right to object to processing of your personal information where it is based on legitimate interests, where it is processed for direct marketing communications (including profiling relevant to direct marketing communications) or

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where it is processed for the purposes of statistics.

- The right to restrict processing of your personal information.
- The right to have your personal information erased (also known as the 'right to be forgotten'). This enables an individual to request the deletion or removal of personal information where there is no compelling reason for its continued processing.
- The right to request access to the personal information held about you. You may make a request in writing (including email) or verbally (e.g. by calling us). There is no charge to make such a request and we will aim to respond within one calendar month.
- The right to data portability. This allows individuals to obtain and reuse their personal information for their own purposes across different services; to move, copy or transfer their personal information easily from one environment to another in a safe and secure way without hindrance to usability.
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you. This right allows individuals in certain circumstances to access certain safeguards against the risk that a potentially damaging decision is taken solely without human intervention.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of these rights against the Credit Reference Agencies, the Fraud Prevention Agencies, or a broker or other intermediary who is data controller in its own right, you should contact them separately.

## Data anonymisation and use of aggregated information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described in this privacy notice.

## Data privacy notices from other organisations

We have mentioned that we share your personal information with CRAs. They require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. These notices are separate to our own. The identities of the CRAs, their role also as Fraud Prevention Agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at [www.experian.co.uk/crain](http://www.experian.co.uk/crain)