



# Managing Your Information Privacy Notice



## 1. Introduction

London Plus Credit Union Limited (also known as Wandsworth Plus Credit Union) is committed to protecting our members' privacy.

Any information we ask you for that is marked as mandatory is required to meet our legal obligations or to enable us to perform our contract with you. Where you are not able to provide us with this information, we may not be able to open an account for you or offer you a loan. Where we request information from you that is not required for these purposes, we will ask for your permission.

### External links

You may encounter links to external websites when using our website. This Notice does not cover these websites and we encourage you to view each website's privacy policy before submitting any information.

## 2. How we obtain personal information

We obtain personal information:

- Directly from you, for example when you fill out an application to join London Plus
- By observing how you use our products and services, for example from the operation of your accounts and the payment history on your loans, as well as your communications with us such as telephone calls, emails, SMS and social media
- From other organisations such as credit reference and fraud prevention agencies, employers, tracing agencies, solicitors and debt recovery agencies
- From other people who know you, including people you are linked to financially.



We may also obtain some personal information from monitoring or recording calls and when we use CCTV. We may record or monitor phone calls with you for regulatory purposes, for training and to ensure and improve quality of service delivery, to ensure safety of our staff and customers, and to resolve queries or issues. We may also use CCTV on our premises to ensure the safety and security of our staff and customers.

### Information gathered from people acting on your behalf

Sometimes, we will need to collect information from people acting on your behalf. This could be from a trustee, a parent, guardian or someone who holds a Power of Attorney. If someone acting on your behalf provides this information, we will record what has been provided and who gave it to us.

In the event that you are providing information about another individual, we will assume that you have told them that you are sharing their details and where they can find more information on how we may process their details.

### Use of Artificial Intelligence (AI)

Our AI Chatbot does not request, collect or use any personal data from users during interactions. If you choose to provide personal data during your use of the Chatbot, the system is set up to redact (remove) this before chats are saved for analytic and training purposes. If personal data is not recognised and redacted however, it will be handled in accordance with our Privacy Policy. Although we are committed to safeguarding your privacy and ensuring that information is treated securely, due to the unstructured nature of the data, it is not possible to find and delete any personal data provided once it is stored.

## 3. How we use your personal information

London Plus may process, transfer and/or share your personal information in the following ways:

### To meet our legal obligations

- Confirm your identity
- Perform activity for the prevention of financial crime



- Carry out internal and external auditing
- Record basic information about you on our register of members
- We will process your personal data for regulatory compliance under the Common Reporting Standard (CRS) and Foreign Account Tax Compliance Act (FATCA), in addition to applicable anti-money laundering and 'Know Your Customer' (KYC) laws.

**To provide you with any services you sign up for**

- Operate your account(s) or run any other services we provide to you
- Send you statements, new terms and conditions, information about changes to the way your account(s) operate, information about London Plus and your membership rights and notification of our annual general meeting
- Consider any applications made by you and make and administer any loans
- Carry out credit checks, and obtain and provide credit references
- Undertake statistical analysis, to help evaluate the future needs of our members and to help manage our business.

**Based on our legitimate interests:**

- Recover any debts owed to us, for example we retain your National Insurance number in the event of a benefit deduction claim.

**With your express permission:**

- Take steps to maintain and develop our relationship with you, including marketing our products and services and market research. You may ask us to stop contacting you for these purposes at any time.

Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We do not routinely collect or process data of this kind and will only do so with your explicit consent. We will only use this kind of personal information where:

- We have a legal obligation to do so



- It is necessary for us to do so to protect your vital interests
- It is necessary for the prevention or detection of crime
- It is necessary for insurance purposes
- You have specifically given us explicit consent to use the information.

**4. Sharing your personal information**

We may occasionally share your information with third parties where you have authorised us to do so, or:

- To third parties to help us confirm your identity and comply with money laundering legislation
- To credit reference agencies and debt recovery agents who may check the information against other databases – private and public – to which they have access
- To any authorities if required to do so by law (e.g. to HM Revenue & Customs to fulfil tax compliance obligations)
- Data may be transferred to tax authorities and, where required, exchanged with foreign tax authorities under international agreements to fulfil our obligations under the Common Reporting Standard (CRS), Foreign Account Tax Compliance Act (FATCA) and related law.
- To fraud prevention agencies to help prevent crime or where we suspect fraud
- To organisations who provide a service or benefits to you, in some cases pursuant to data sharing agreements that we have entered into with those persons. These may include, but are not limited to, insurers, your council or your housing provider or your employer
- To our suppliers in order for them to provide services to us and/or to you on our behalf, for example third parties who help us to operate online lending systems or who assist us to recover debts, audit our accounts or carry out statistical analysis
- To anyone in connection with a reorganisation or merger of London Plus's business.



## 5. Where we send your personal information

While countries in the European Economic Area all ensure rigorous data protection laws, there are parts of the world that may not be quite so rigorous and do not provide the same quality of legal protection and rights when it comes to your personal information.

London Plus does not directly send information to any country outside the European Economic Area. However, any party receiving personal data may also process, transfer and share it for the purposes set out above and in limited circumstances this may involve sending your information to countries where data protection laws do not provide the same level of data protection as the UK.

For example, when complying with international tax regulations we may be required to report personal information to the HM Revenue and Customs which may transfer that information to tax authorities in countries where you or a connected person may be tax resident.

## 6. Retaining your information

London Plus will need to hold your information for various lengths of time depending on what we use your data for. In many cases we will hold this information for a period of time after you have left London Plus, but we will not hold your information for longer than is necessary.

We are required to retain your details in our members' register permanently by legislation, and to retain certain details in our accounting records to maintain the financial integrity of our systems and comply with regulatory obligations.

We generally dispose of archived paper records after six years, in line with financial regulation, excluding papers and scanned copies relating to loans or debts that remain active or recoverable.

## 7. Credit reference agencies



In order to process credit applications you make, we will supply your personal information to credit reference agencies (CRAs) and they will give us information about you, such as about your financial history. We do this to assess creditworthiness and product suitability, check your identity, manage your account, trace and recover debts and prevent criminal activity.

When CRAs receive a search from us, they will place a search footprint on your credit file that may be seen by other lenders (for example, banks and other credit providers).

We will also continue to exchange information about you with CRAs on an ongoing basis, including about your settled accounts and any debts not fully repaid on time. CRAs will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. This may affect your ability to get credit.

The identities of the CRAs, and the ways in which they use and share personal information, are explained in more detail here:

- Transunion at [www.transunion.co.uk/crain](http://www.transunion.co.uk/crain)
- Equifax at <https://www.equifax.co.uk/privacy-hub/crain>
- Experian at <https://www.experian.co.uk/legal/crain/>

## 8. Your rights

Your rights under data protection regulations are:

- (a) The right to access
- (b) The right of rectification
- (c) The right to erasure
- (d) The right to restrict processing
- (e) The right to object to data processing
- (f) The right to data portability
- (g) Rights related to automated decision-making
- (h) The right to withdraw consent
- (i) The right to complain to the Information Commissioner's Office



These rights are explained in more detail below.

**a. The right to access**

You have the right to access a copy of your personal data along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge by contacting us. Please make all requests for access in writing and provide us with evidence of your identity.

**b. The right to rectification**

You have the right to instruct us to promptly correct any inaccurate personal data about you and where appropriate, to have any incomplete personal data about you completed.

**c. The right to erasure**

In some circumstances you have the right to the erasure of your personal data without undue delay.

Those circumstances include:

- The personal data is no longer needed for the purpose it was originally processed
- You withdraw consent you previously provided to allow us to process the information
- The processing is for marketing purposes
- The personal data was unlawfully processed.

However, we will not erase this data where we need it to meet a legal obligation or where its necessary for the establishment, exercise or defence of legal claims.

**d. The right to restrict processing**

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- To contest the accuracy of the personal data
- Processing is unlawful but you oppose erasure



- We no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims
- You have objected to processing based on our legitimate interests, pending the verification of that objection.

In practice, we do not expect that this right will be relevant to our members, given the nature of our activities. Members will instead be protected by their rights to rectification and erasure and to object to direct marketing. However, where you are entitled to restrict processing on any of the four grounds set out above, we may continue to store your personal data, but we will only otherwise process it:

- With your consent
- For the establishment, exercise or defence of legal claims
- For the protection of the rights of another natural or legal person.

**e. The right to object to processing**

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the data is necessary for the purposes of the legitimate interests pursued by us or by a third party.

You therefore have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose. We do not otherwise process data based on our legitimate interests.

**f. The right to data portability**

To the extent that the legal basis for our processing of your personal data is:

- Consent
- That the processing is necessary for the performance of our contract with you,

you have the right to receive your personal data from us in a commonly used and machine-readable format or instruct us to send this data to another



organisation where this is technically feasible. This right does not apply where it would adversely affect the rights and freedoms of others.

#### **g. Rights related to automatic processing**

We may use an automated decision-making process to assist us with processing certain types of loan applications, to make sure that our decisions are quick, fair, efficient, and correct based on what we know.

The automated lending decision system looks at your credit score alongside information such as:

- The value of the loan you have applied for
- Your income and expenditure
- Your history of repaying debts
- The number and value of any County Court Judgments (CCJs) you have
- The number of accounts you have that are in default
- Information available from public sources such as the insolvency service
- Whether or not you are bankrupt
- Your age

and provides a recommendation or makes a decision based on either:

- Set policies e.g. London Plus does not lend to those less than 18 years of age, or London Plus does not lend to people with CCJs over a certain value
- The predicted likelihood of the repayment of the loan based on the statistical analysis of whether individuals who had a similar credit profile repaid their debts in the past.

Generally, your application will then be reviewed by a member of the credit committee, before we make a final decision. However, where we rely on the automated system to make our decision, you have the right to have that decision reviewed by a member of staff, express your point of view, and obtain an explanation of the decision and challenge it.

#### **h. The right to withdraw consent**

To the extent that the legal basis for our processing of your personal information is your consent, you have the right to withdraw that consent at any



time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

#### **i. The right to complain to the Information Commissioner's Office**

If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Information Commissioner's Office which is responsible for data protection in the UK. You can contact them by:

1. Going to their website at: <https://ico.org.uk>
2. Phone on 0303 123 1113
3. Post to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

### **9. Contact us about your rights**

For more information about how your rights apply to your membership of London Plus or to make a request under your rights, you can contact us as below. We will aim to respond to your request or query within one month or provide an explanation of the reason for our delay.

Our contact details are:

**London Plus Credit Union Limited**

**Dawes Hub, 20 Dawes Road, London, SW6 7EN**

**Telephone 020 7471 2620 Email: [memberservices@londonpluscu.co.uk](mailto:memberservices@londonpluscu.co.uk)**

**Web: [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk)**

### **10. Changes to this privacy policy**

We can update this Privacy Policy at any time and ideally you should check it regularly at [www.londonpluscu.co.uk](http://www.londonpluscu.co.uk) for updates. We won't alert you for every small change, but if there are any important changes to the Policy or how we use your information, we will let you know and where appropriate ask for your consent.

**London Plus Credit Union Limited** is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential



Regulation Authority – Firm Reference 473340. It is a member of the Financial Ombudsman Service and member deposits are covered by the Financial Services Compensation Scheme.

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