

Data Protection.

Privacy is a fundamental right and data protection is used to guard that right. Our data protection compliance involves a series of internal policies, procedures and systems designed to minimise the risk of non-compliance with the UK data protection laws (meaning UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communication Regulation).

Assessing and managing data protection risks is vital to achieving the correct customer, commercial and regulatory outcomes. Together's Data Protection Compliance Policy defines the key risk principles, followed to support operational adherence to the Enterprise Risk Management Framework and associated regulations and legal requirements. The Data Protection Compliance Policy is applicable for all personal data processed within the organisation; for colleagues, customers and third parties e.g. name and contact information, address information and personal financial information.

Our Vision and Beliefs.

The Group's Vision is to be the most valued lending company in the UK, which drives the design ethos for building both the products and the operational processes that support them.

Our beliefs form the foundation of the Group policy design criteria. This criteria has informed the risk policies with a line of sight from the defined risk and its ownership, the risk appetite, where it arises, and the manner of its control.

Accountability.

Our Data Protection Compliance Policy, along with all our other Policies and Standards, apply to all colleagues including temporary colleagues, contractors, suppliers and third parties that carry out activities on behalf of the Group and its subsidiaries. The scope of the Data Protection Compliance Policy covers Group Personal Data in any form.

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Our Group Chief Compliance Officer sponsors adherence to the Data Protection Policy at Board Risk Committee. Our Head of Data Protection and Information Security is the Group's Data Protection Officer (DPO) and is responsible for developing the Data Protection Compliance Policy and securing its review and approval from the appropriate stakeholders. The DPO is also responsible for overseeing and reporting on the Group's adherence with the Data Protection Compliance Policy's requirements, and providing assurance on the implementation of key controls.

The Head of Data Protection and Information Security, together with the Data Protection Team maintains the Data Protection Compliance Policy, other supporting data protection policies and procedures, and provides appropriate guidance materials to support effective policy implementation.

The Group executes its system of internal controls and risk management activities through the three lines model, at both a Group and divisional level.

Purpose.

Our Data Protection Compliance Policy is intended to provide a framework which creates a privacy first approach to the handling of Personal Data. Through compliance with the UK data protection laws, communicating transparently about our data processing practices and ensuring the appropriate security is in place, we are able to collect and use Personal Data lawfully.

The purpose of the Data Protection Compliance Policy is to ensure that data protection risks are managed in line with the Group strategic plan and within agreed risk appetite. It outlines our approach to minimise the risk of failing to reasonably prevent incidents or a personal data breaches.

The Data Protection Compliance Policy is underpinned by a range of frameworks and controls which include (but are not limited to):

- Clear communication on how and why we use Personal Data e.g. through our Privacy Policy on the website
- A Fair Processing Notice which outlines our retention periods and customer rights
- Operational controls including role based access controls, data encryption and firewalls
- Annual training for all colleagues, contractors, agency staff and those on fixed-term contracts
- Reporting and oversight through our three lines of defence model of risk management
- Assurance from our independent audit function.

The Data Protection Compliance Policy is also subject to at least an annual review in order to ensure it remains accurate and fit for purpose.