



IMPORTANT INFORMATION

Coutts

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1. Your information

- 1.1 We collect and process various categories of personal and financial information throughout your relationship with us, to allow us to provide our products and services and to run our business. This includes basic personal information such as your name and contact details, and information about your financial circumstances, your accounts and transactions. This section sets out how we may share your information with other RBS Group companies and third parties.
- 1.2 For more information about how we use your personal information, the types of information we collect and process and the purposes for which we process personal information, please read our full Privacy Notice (our 'Privacy Notice') provided on our website [coutts.com/privacynotice](https://www.coutts.com/privacynotice)
- 1.3 We may update our Privacy Notice from time to time, by communicating such changes to you and/or publishing the updated Privacy Notice on our website [coutts.com/privacynotice](https://www.coutts.com/privacynotice). We would encourage you to visit our website regularly to stay informed of the purposes for which we process your information and your rights to control how we process it.
- 1.4 In respect of any personal information relating to a third party that you provide to us, you must:
- notify the third party that you are providing their personal information to us and obtain their permission;
 - provide the third party with a copy of our Privacy Notice and these Terms;
 - promptly notify the third party of any changes to our Privacy Notice that we notify you of; and
 - ensure that, to the best of your knowledge, the personal information is accurate and up to date, and promptly notify us if you become aware that it is incorrect.
- 1.5 Your information may be shared with and used by other RBS Group companies. We will only share your information where it is necessary for us to carry out our lawful business activities, or where it is necessary to comply with laws and regulations that apply to us.
- 1.6 We will not share your information with anyone outside RBS Group except:
- where we have your permission;
 - where required for your product or service;
 - where we are required by law and to law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
 - with other banks and third parties where required by law to help recover funds that have entered your account as a result of a misdirected payment by such a third party;
 - with third parties providing services to us, such as market analysis and benchmarking, correspondent banking, and agents and subcontractors acting on our behalf, such as the companies which print our account statements;
 - with other banks to help trace funds where you are a victim of suspected financial crime and you have agreed for us to do so, or where we suspect funds have entered your account as a result of a financial crime;
 - with debt collection agencies;
 - with credit reference and fraud prevention agencies;
 - with third party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
 - where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;
 - in anonymised form as part of statistics or other aggregated data shared with third parties; or
 - where permitted by law, it is necessary for our legitimate interests or those of a third party, and it is not inconsistent with the purposes listed above.

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- 1.7 If you ask us to, we will share information with any third party that provides you with account information or payment services. If you ask a third party provider to provide you with account information or payment services, you are allowing that third party to access information relating to your account. We are not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.
- 1.8 In the event that any additional authorised users are added to your account, we may share information about the use of the account by any authorised user with all other authorised users.
- 1.9 We will not share your information with third parties for their own marketing purposes without your permission.
- 1.10 We may transfer your information to organisations in other countries (including to other RBS Group companies) on the basis that anyone to whom we pass it protects it in the same way we would and in accordance with applicable laws. We will only transfer your information if we are legally obligated to do so, or where the other country has laws that adequately protect your information, or where we have imposed contractual obligations on the recipients that require them to protect your information to the same standard as we are legally required to.
- 1.11 Communications**
- 1.11.1 We may contact you with information relevant to the operation and maintenance of your account(s) (including statements) or in connection with the Private Client Agreement, including updated information about how we process your personal information, by a variety of means including:
- post;
 - phone;
 - email (to the email address provided);
 - messaging via the Online Service (if used by you);
 - text message (to the mobile number provided); or
 - any other means we agree with you.
- If at any point in the future you change your contact details you should tell us promptly about those changes.
- 1.11.2 If you need to contact us about any matter please call +44 (0)20 7957 2424, write to us at 440 Strand, London WC2R 0QS or contact your private banker.
- 1.11.3 We may monitor or record calls, emails, text messages, electronic messages or other communications, in accordance with applicable laws, to ensure that we provide a good service and that we follow your instructions correctly, or for any of the purposes specified detailed in clause 1.6.
- 1.11.4 Please note if you contact us electronically, we may collect your electronic identifier (eg Internet Protocol (IP) address of telephone number) supplied by your service provider.
- 1.11.5 All communications from us to you (including the documents containing the terms of the contract between you and us) will be in English.
- 2. Security**
- We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. For more information on the steps we are taking to protect your information please visit [coutts.com/security](https://www.coutts.com/security)
- 2.1 Whenever you call us, we need to verify your identity to ensure that we are not giving your private information to, or taking instructions for your account from, anyone who is not authorised to do so. A series of questions (answers of which are provided by you in advance) will therefore be asked. Please ensure you give exact answers to the questions we ask. We may also use voice and/or other security procedures to verify your identity.
- 2.2 Sometimes, when you give us a payment instruction, or tell us about a change of details, or if we suspect or become aware that your accounts may be subject to fraud or security threats, we may call you on a number we hold in our records to confirm the instruction. We will only call you on numbers we already hold in our records so please ensure you provide your mobile, evening as well as daytime numbers to ensure we can reach you. Delays may occur where we cannot reach you.
- 2.3 If we call you, for any reason, you can ask the person who called you to prove who they are. To do this, they will ask you to call them back on our switchboard number, +44 (0) 20 7957 2424 and ask for them by name. You should do this from a different phone line to the one you received the call on to prevent your call being intercepted. Please note that after initial registration or enrolment we will never proactively contact you, or ask anyone to do so on our behalf, with a request to disclose your security details in full. If you receive any such request from anyone (even if they are using our name and logo and appear to be genuine) then it is likely to be fraudulent and you must not supply your security details to them in any circumstances. You should report any such requests to us immediately.
- 2.4 Some third party providers might ask you for your online banking log in details and password to provide their services to you. If you decide to give them this information, this means that they will be able to see and do anything you can on your accounts.
- 2.5 You must help us to protect your information and accounts from fraud by undertaking the following security measures:

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- a) Do not keep your cheque book and cards together.
- b) We will provide a PIN (and sometimes a one-time passcode) for the use of a card, and you may be required to set a password. We will never ask you to tell us your PIN. If you are in any doubt about whether a caller is genuine or if you are suspicious about them, take their details and call us. Always make sure the caller has disconnected the call or use a different phone line.
- c) If you change your PIN, you should choose your new PIN carefully.
- d) Do not use the same PIN for more than one card.
- e) Never respond to emails requesting your security details including PINs and passwords.
- f) Always carefully check your bank statements upon receipt and immediately report any unrecognised or suspicious transactions.
- g) Tell us immediately if you change your name, address, telephone number or email address.
- h) Always take reasonable steps to keep your card, PIN, password and other security information safe at all times.
- i) Never give your account details or other security information or online login details to anyone (except where necessary for any third party provider you ask to provide you with account information or payment services). You must take care to ensure that only persons authorised by you can use or have access to your account.
- j) Keep your card receipts and other information about your account containing personal details (for example, statements) safe and dispose of them carefully preferably by shredding them.
- k) Take care when storing or disposing of information about your accounts. People who commit fraud use many methods such as 'bin raiding' to get this type of information. You should take simple steps such as shredding printed material.
- l) Be aware that your post is valuable information in the wrong hands. If you do not receive a bank statement, card statement or any other expected financial information, contact us.

You will find the UK Payments Administration website cardwatch.org.uk a helpful guide on what to do if you suspect card fraud. Please go to coutts.com/security which features further details on how you can protect yourself from fraud.

3. Regulatory information

- 3.1 We are authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. We are entered on the Financial Services Register and our Firm Reference Number is 122287.

3.2 Compensation

We are covered by the Financial Services Compensation Scheme (FSCS). The FSCS can pay compensation to depositors if a bank is unable to meet its financial obligations. Most individuals, businesses and corporations can claim back up to £85,000 of their deposits (or £85,000 for each eligible account holder of a joint account). An FSCS Information Sheet, including a list of exclusions from the Scheme, will be provided on an annual basis. For further information about the compensation provided by the FSCS, refer to the FSCS website at fscs.org.uk

3.3 Complaints

3.3.1 If you are not satisfied with any of our products or services, we have a complaint handling procedure which you can use to resolve such matters. You may request a leaflet giving details of the procedure from any of our offices or by contacting us.

3.3.2 If you are still not satisfied after following our complaint handling procedures, you may be able to ask the Financial Ombudsman Service (FOS) to review your complaint. The Ombudsman will consider complaints made by private individuals, micro-enterprises, small charities, small trusts and small and medium sized enterprises with an annual turnover of less than £6.5 million and employs fewer than 50 persons or it has a balance sheet total of less than £5 million, at the time it refers to the complaint.

3.3.3 You can find out more about the Financial Ombudsman Service in a leaflet available from any of our offices or by contacting us. Alternatively, you can write to the Financial Ombudsman Service, Exchange Tower, London E14 9SR or telephone 0800 023 4567 or visit financial-ombudsman.org.uk

3.3.4 If you:

- a) are resident in the EU;
- b) have **purchased a product or service online** from a trader established in the EU; and
- c) are unable to get your complaint resolved satisfactorily,

you can contact the European Commission by accessing the Online Dispute Resolution (ODR) platform at <http://ec.europa.eu/odr> To use this service you will need the following information:

- email address: odrplatform@coutts.com
- our name: Coutts & Co.

The ODR platform will then send your complaint to the FOS for an independent review.