

Privacy Notice

Coutts

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Privacy Notice

1 Who we are

1.1 This privacy notice (the "Privacy Notice") applies to all information we collect, use and process about you as an individual in relation to the products/services you receive from us carried out by Coutts.

1.2 Coutts is a data controller in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, references to "we", "us" or "our" are references Coutts.

1.3 Our principal address is 440 Strand, London, WC2R 0QS and our contact details can be located at **Coutts.com**.

1.4 We are a member of NatWest Group plc. More information about the NatWest group and its brands can be found at **NatWestGroup.com**.

1.5 We respect individuals' rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we and other NatWest group companies collect and use personal information in connection with our business. "Personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information).

2 The information we process

2.1 We collect and process various categories of personal and confidential information at the start of, and for the duration of, your relationship with us and beyond (subject to appropriate retention periods as set out in section 12 below). We will limit the collection and processing to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal and confidential information may include:

a) basic personal information, including name and address, date of birth, contact details, nationality;
b) financial information, including account and transactional information and history, payment and payee details;
c) information about your family, lifestyle and social circumstances and preferences;
d) information about your financial circumstances, including personal wealth, assets and liabilities, proof of income and expenditure, credit and borrowing history and needs and goals;
e) information relating to climate, including utility consumption, property features such as housing certification ratings, vehicle and journey details, and carbon emission data;
f) education, employment and business information;
g) goods and services provided;
h) visual images and personal appearance (such as photos, copies of passports or CCTV images), voice recordings, fingerprints;
i) online profile and social media information and activity, based on your interaction with us and our websites and applications, including for example your banking profile and login information, Internet Protocol (IP) address, smart device information, location coordinates, online and mobile banking security authentication, mobile phone network information, searches, site visits and spending patterns; and
j) our Payment Services company, Tyl by NatWest, may collect information relating to transactions performed by our card holders.
k) information in relation to your conduct in connection with your account or your interactions with us, including records of behaviour towards our staff, records of complaints or incidents, and internal assessments or reports where your behaviour may be considered offensive, threatening, abusive, violent, discriminatory or otherwise inappropriate.
l) information relating to your eligibility for products and services, including your residency, nationality or legal status.

2.2 We may also process certain special categories of information for specific and limited purposes, such as to make our services accessible to clients or for reporting of complaints for regulatory purposes, or where it is in the wider public interest (for example, to protect clients' economic wellbeing or to prevent and detect unlawful acts, fraud and financial crime). We will only process special categories of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so (and then only for the particular purposes and activities for which the information is provided as set out in Schedule A). This may include information revealing:

a) racial or ethnic origin;
b) political opinions;
c) religious or philosophical beliefs;
d) trade union membership;
e) biometric data;
f) information concerning health; and
g) data concerning a person's sex life and sexual orientation.

2.3 Where permitted by law we may process information about criminal convictions, criminal offences, related security details, alleged offences including unproven allegations, spent or previous convictions, or other details provided in relation to a criminal reference check or similar.

2.4 Where we rely on your consent to process your special category data, you can withdraw your consent at any time by contacting us. Please note that in some cases we do not rely on consent to process special category data.

2.5 We may use artificial intelligence models in the course of providing products, services and to detect and prevent financial crime, fraud and other criminal activities. This may include use of generative artificial intelligence models. We may also use your information to train artificial intelligence models. When you interact with artificial intelligence models, further information may be provided to help you understand how the artificial intelligence model has processed your information and reached a particular decision. NB. An AI system is a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment.

2.6 We may collect and use information that has been made publicly available, including information published on websites, public registers, open data sources, professional networking sites, forums and other publicly accessible online services. We may use automated tools to identify and collect relevant information where permitted by law and in accordance with applicable data protection requirements. We do not intentionally collect special category personal data from such sources unless we have a lawful basis to do so and have implemented appropriate safeguards.

3 How we obtain information

3.1 Your information is made up of all the financial and personal information we collect and hold about you/your business and the proprietors, officers and beneficial owners of that business and your transactions. It includes:

a. information you give to us;
b. information that we receive from third parties – including other NatWest group companies,
   (i) third parties who provide services to you or us,
   (ii) credit reference, fraud prevention, law enforcement or government agencies,
   (iii) industry and trade bodies,
   (iv) other banks (where permitted by law);
   (v) energy companies and energy regulators where we have a legal basis to obtain this data; and
   (vi) third parties to whom we provide a product or service including where we act as a funder to a third party and take a beneficial interest in third party assets.
c. information that we learn about you through our relationship with you and the way you operate your accounts and/or services, such as the payments made to and from your accounts and payees from your account and where you are identified as a payee;
d. information generated by us in the course of managing our relationship with you, information about your conduct through the way you use your account and interact with us, which includes internal records, staff reports, call recordings & transcripts, CCTV footage, correspondence and notes relating to your conduct or interactions with us.
e. information that we gather, where we have your consent, through cookies or similar tracking tools when you use our websites, internet banking, mobile banking app, email or web chat services. Advertising or targeting cookies or similar technologies may also be used, with your consent, to track your responses to particular adverts, messages or forms, which helps us to ensure we present you with the most relevant content in the future;
   Cookies may also be set if you click on a link within the email.
   We track delivery and analyse the click rates of bulk emails in order to:
   - Identify delivery problems with Internet Service Providers.
   - Provide evidence that regulatory messages are being opened.
   - Ensure subject lines and email content are clear and helpful.
   - Measure the overall performance of communication campaigns.
   - Make our communications more relevant.

   By default, tracking logs are deleted after 6 months.
f. information that we gather from the technology which you use to access our services (for example, device data location, data from your device, or an IP address or telephone number) and how you use it (for example, pattern recognition);
g. information that we gather from publicly available sources, such as the press, the electoral register, company registers and online search engines. This may include proactively obtaining reliable information from publicly available sources confirming previous criminal convictions for specific offence types; and
h. information obtained through remote sensing such as satellite for determining geographical sources of emissions; identifying land uses including for farm use/crops; identifying possible locations for emission reduction actions.

4 Your rights

4.1 We want you to understand your rights and how we use your personal information.
In the table below, we explain your rights, when they apply, and how you can contact us to use them.
Please be aware that in some cases, if you're not happy with how we use your information, we may not be able to keep running your account or provide some products or services.

Rights	Description
Lodge complaints – You have a right to lodge a complaint.	If you have concerns about how we use your personal information, you have the right to complain. You can contact us and we will investigate your concern. For more information on how to raise a complaint please visit our website: **Coutts Complaints Handling Policy** If you remain dissatisfied after receiving our response, you have the right to raise your concern with the Information Commissioner's Office (ICO). However, the ICO expects and, in most cases, requires that you first raise your complaint directly with us and allow us the opportunity to investigate and respond. The ICO will typically only consider complaints where an organisation has been given this opportunity to resolve the issue. For more information, visit **ico.org.uk**
Access – You have a right to get access to the personal information we hold about you.	If you would like a copy of the personal information we hold about you, please contact your Private Banker. For more information on how to get access to your information and the documents we need you to submit, please visit our website at **coutts.com** or contact your Private Banker. You can also contact our Data Protection Team at: **NatWestDataProtection@natwest.com** we'll review your request and get back to you within one month.
Rectification – You have the right to ask us to correct any personal information that is inaccurate, or to update any information that is incomplete.	If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information. Please contact our Data Protection Team at: **NatWestDataProtection@natwest.com** We'll review your request and get back to you within one month. Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.
Restriction – In certain circumstances you have the right to ask us to limit how we use your personal information.	You may request us to restrict processing your personal information if you believe that: • any of the information that we hold about you is inaccurate; • we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or • we are not using your information in a lawful manner. Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you. To make a request to restrict your data, please contact our Data Protection Team at: **NatWestDataProtection@natwest.com** We'll review your request and get back to you within one month.

Rights	Description
Erasure – You have a right to request that we delete your personal information in certain circumstances.	To make a request for your data to be deleted, please contact our Data Protection Team at: **NatWestDataProtection@natwest.com** Sometimes, we may not be able to delete your personal information when you ask us to. This is because we may need to keep it for legal or regulatory reasons, or to provide the services you have with us. If this happens, we will explain why and let you know if there is anything we can do instead. We'll review your request and get back to you within one month.
Portability – You have a right to data portability.	Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format. You may also request us to provide it directly to a third party, if technically feasible. 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. If you would like to request the personal information you provided to us in a portable format, please contact your Private Banker. You can also contact our Data Protection Team at: **NatWestDataProtection@natwest.com** we'll review your request and get back to you within one month.
Objection – You have a right to object to the processing of your personal information.	You have a right to object to us processing your personal information (and to request us to restrict processing) for the purposes described in Section C of Schedule A – Purposes of Processing (below), unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests or where we need to process your information to investigate and protect us or others from legal claims. Depending on the circumstances, we may need to restrict or cease processing your personal information altogether, or, where requested, delete your information. Please note that if you object to us processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you. If you would like to object to how we process your personal information, please contact our Data Protection Team at: **NatWestDataProtection@natwest.com** We'll review your request and get back to you within one month.
Marketing – You have a right to object to direct marketing.	You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing. For more information see Section 9. For any other objections to how we use your personal information for marketing, including profiling, you can contact our Data Protection Team at: **NatWestDataProtection@natwest.com** The team will review your request and respond within one month.
Automated decisioning – You have a right to object to automated decision-making or profiling.	You have rights in relation to automated-decision making or profiling, including a right to appeal if your application is refused. You can appeal via our normal complaints process outlined above. If you would like to object to an automated decision or request for us to review an automated decision, please contact our Data Protection Team at: **NatWestDataProtection@natwest.com** We'll review your request and get back to you within one month.

Rights	Description
Withdraw consent – You have a right to withdraw your consent.	Where we rely on your permission to process your personal information, you have a right to withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities. To withdraw your consent contact our Data Protection Team at: **NatWestDataProtection@natwest.com** The team will review your request and get back to you within one month.

5 Changes to the way we use your information

From time to time, we may change the way we use your information. When we do, we will communicate any changes to you and publish the updated Privacy Notice on our website. 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.
Where we believe you may not reasonably expect such a change, we will notify you and will allow a period of at least 30 days for you to raise any objections before the change is made. However, please note that in some cases, if you do not agree to such changes it may not be possible for us to continue to operate your account and/or provide certain products and services to you. Where relevant, we may also include further details or information in relation to a particular service or activity at the point information is collected or the product or service is considered.

6 How we use and share your information with other NatWest group companies

We will use and share your information with other NatWest group companies to lawfully carry out our business activities as a group of companies (for example, to manage our risk, to meet our regulatory or legal requirements, to support our decision-making processes, to provide you with products or services, to support your welfare needs, for marketing services, for internal reporting, or where those companies provide services to us or where we provide services to other NatWest group companies). We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in a table in Schedule A – Purposes of Processing.

7 Sharing with other third parties

7.1 We will not share your information with anyone outside the bank except:

a) where we have your permission;
b) where required, whether directly or indirectly, for your product or service, which could include in relation to your welfare or accessibility requirements;
c) with law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory or trade bodies around the world;
d) with other banks and third parties in relation to fraud or financial crime or criminal activities; or in the event of suspected fraud or financial crime or criminal activities; or the monitoring, prevention and investigation of the same; with other banks and third parties to help recover funds that have entered your account as a result of a misdirected payment by such a third party;
e) with third parties providing services to us, such as market analysis and benchmarking, climate and broader environmental impact analysis, correspondent banking, agents and sub-contractors acting on our behalf, such as the companies which print our account statements, where advice or services are required or requested in connection with the bank's legal, regulatory or contractual rights or obligations relating to products or services provided to you;
f) with social media companies (in a secure format) or other third-party advertisers and marketing companies so they can display or send relevant messages to you and others or compile information relevant to marketing to you about our products and services on our behalf. Third party advertisers may also use information about your previous web activity to tailor adverts which are displayed to you;
g) with credit reference agencies and with third parties in relation to debt collection and related activities;
h) with third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
i) where required for a proposed or actual sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business where such data is shared with a third party it is done so under strict duties of confidentiality;
j) in anonymised form as part of statistics or other aggregated data shared with third parties such as companies that provide you with benefits or services; or
k) 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.

7.2 If you ask us to, we will share information with any third party that provides you with services such as account information or payment initiation services. If you ask a third-party provider to provide you with these services, you are allowing that third party to access information we hold. We are not responsible for any such third party's use of the information shared with your agreement. Their use of the information will be governed by their agreement with you and any privacy statement they provide to you. Where you agree to information being shared with a third party for provision of services, it should be noted that we may charge the third party as part of a commercial arrangement to provide the service.
Where you ask us to initiate a euro payment to a recipient in Europe, we will share your personal information with other banks on a joint controller basis in order that the transaction may be progressed. This means that each bank will work together to decide why and how your personal information is processed. It also means that we are jointly responsible to you for that processing. We share this information in order that we and other banks can perform their respective contractual and legal obligations. However, where you have a query or issue with regard to your euro payment instruction, you should contact us as your account holder.

7.3 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.

7.4 In the event that you aggregate your assets and liabilities with your immediate family for the calculation of fees, the sum of the combined assets and liabilities held by all applicable family members may be shared with other members of your family. In some instances, this may allow other members of your family to calculate the combined assets and liabilities you hold with us.

7.5 We will not share your information with third parties for their own marketing purposes without your permission.

7.6 The Society for Worldwide Interbank Financial Telecommunications (known as SWIFT) and ourselves are "joint controllers" of the processing of your personal information. To view our Joint Controller Notice, **click here**.

8 Transferring information overseas

8.1 We may transfer your information to organisations in other countries (including to other NatWest 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.

8.2 In the event that we transfer information to countries outside of the UK and European Economic Area (which includes countries in the European Union as well as Iceland, Liechtenstein and Norway), we will only do so where:

a) the UK has decided that the country or the organisation we are sharing your information with will protect your information adequately;
b) the transfer has been authorised by the relevant data protection authority; and/or
c) we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the UK) to ensure your information is adequately protected. If you wish to obtain a copy of the relevant data protection clauses, please contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

9 Marketing information

Where we have appropriate marketing permissions, we will send you relevant marketing information during the course of our relationship with you and for a period of 12 months after the relationship has ended (including details of other products or services provided by us, other NatWest Group companies or other selected third parties which we believe may be of interest to you). We may contact you by mail, phone, email, text, our digital services and other forms of electronic communication. Coutts will not share your information with non-NatWest group third parties for their own marketing purposes.
If you change your mind about how you would like us to contact you or you no longer wish to receive this information, you can change your preferences in the mobile app or can tell us at any time by contacting us at **03457 888 444**. Overseas number **+44 3457 888 444**, Relay UK **18001 03457 888 444**, via online banking, webchat or in branch.

10 Communications about your account

10.1 We will contact you with information relevant to the operation and maintenance of your account (including updated information about how we process your personal information), by a variety of means including via our digital services, electronic message, post and/or telephone. If at any point in the future you change your contact details you should tell us promptly about those changes.

10.2 We may monitor or record calls, emails, text messages, webchat or other communications in accordance with applicable laws for the purposes outlined in Schedule A – Purposes of Processing.

10.3 We may contact you if we have concerns about your economic wellbeing and offer support.

11 Credit reference and fraud prevention agencies

11.1 We may access and use information from credit reference and fraud prevention agencies when you open your account and periodically to:

a) manage and take decisions about your accounts, including assessing your creditworthiness and checks to avoid clients becoming over-indebted;
b) prevent criminal activity, fraud and money laundering;
c) check your identity and verify the accuracy of the information you provide to us; and
d) trace debtors and recover debts.

11.2 Application decisions may be taken based solely on automated checks of information from credit reference and fraud prevention agencies and our own internal records. To help us make decisions on when to give you credit, we use a system called credit scoring to assess your application. To work out your credit score, we look at information you give us when you apply; information from credit reference agencies that will show us whether you've kept up to date with payments on any credit accounts (that could be any mortgages, loans, credit cards or overdrafts), or if you've had any court action such as judgments or bankruptcy; your history with us such as maximum level of borrowing; and affordability, by looking at your available net income and existing debts. You have rights in relation to automated decision-making, including a right to appeal if your application is refused. You can appeal via our normal complaints process which can be found here: **https://www.natwest.com/support-centre/how-to-complain.html**.

11.3 We will continue to share information with credit reference agencies about how you manage your account including your account balance, payments into your account, the regularity of payments being made, credit limits and any arrears or default in making payments, while you have a relationship with us. This information will be made available to other organisations (including fraud prevention agencies and other financial institutions) so that they can take decisions about you, your associates and members of your household. The information shared with credit reference agencies may be shared onwards with gambling operators for the purpose of carrying out financial risk checks.

11.4 If false or inaccurate information is provided and/or fraud is identified or suspected, details will be passed to fraud prevention agencies. Law enforcement agencies and other organisations may access and use this information. Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

11.5 If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we and others may refuse to provide the services and financing you have requested, to employ you, or we may stop providing existing services to you.

11.6 A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. Fraud prevention agencies can hold your information for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

11.7 If you would like a copy of your information held by the credit reference and fraud prevention agencies we use, or if you want further details of how your information will be used by these agencies, please visit their websites or contact them using the details below. The agencies may charge a fee.

Credit reference agency	Contact details	
Equifax Limited (https://equifax.co.uk/crain)	**Post:**	Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester LE3 4FS.
	Website:	**https://www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions**
	Online Help:	**equifax.co.uk/ask**
	Phone:	**0333 321 4043 or 0800 014 2955**
Experian Limited (https://experian.co.uk/crain)	**Post:**	Experian, PO BOX 9000, Nottingham NG80 7WF.
	Website:	**https://ins.experian.co.uk/contact**
	Email:	**consumer.helpservice@uk.experian.com**
	Phone:	**0344 481 0800 or 0800 013 8888**

CIFAS (https://cifas.org.uk/fpn)	**Post:** **Website:** **Phone:**	Consumer Affairs, Cifas, 6th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LT. **https://www.cifas.org.uk** **0330 100 0180**
National Hunter Ltd (https://www.nhunter.co.uk/privacypolicy/)	**Post:** **Website:** **Email:**	National Hunter Ltd, PO Box 4744, Stone ST15 9FE. **https://nhunter.co.uk/contactus** **info@nhunter.co.uk**
Dun and Bradstreet (https://www.dnb.co.uk/utility-pages/privacy-policy.html)	**Post:** **Website:** **Phone:**	Marlow International Parkway, Marlow, Bucks SL7 1AJ. **https://www.dnb.co.uk** **0808 239 1423**
TransUnion International UK Limited (https://www.transunion.co.uk/crain)	**Post:** **Website:** **Phone:**	Consumer Service Team, PO Box 491, Leeds LS3 1 WZ. **https://www.transunion.co.uk** **0330 024 7579**

12 How long we keep your information

12.1 By providing you with products or services, we create records that contain your information, such as client account records, activity records, tax records and lending and credit account records. Records can be held on a variety of media (physical or electronic) and formats.

12.2 We manage our records to help us to serve our clients well (for example, for operational reasons, such as dealing with any queries relating to your account) and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.

12.3 Retention periods for records are determined based on the type of record, the nature of the activity, product or service, the country in which the relevant NatWest group company is located and the applicable local legal or regulatory requirements. We (and other NatWest group companies) normally keep client account records for up to ten years after your relationship with the bank ends, whilst other records are retained for shorter periods. Retention periods may be changed from time to time based on business or legal and regulatory requirements.

12.4 We may on exception retain your information for longer periods, particularly where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators. This is intended to make sure that the bank will be able to produce records as evidence, if they are needed.

12.5 If you would like more information about how long we keep your information, please contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

13 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 about the steps we are taking to protect your information please visit **coutts.com/security** or contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

14 Automated Processing

14.1 In the course of providing products and services to you we may process your personal information by automated means, to include profiling. What this means is that we will use computer software or predictive analysis to automatically evaluate your personal circumstances in order to identify risks or to predict certain outcomes. Examples of this type of processing include;

a) automatically calculating loan/credit limits;
b) obtaining credit reference checks for certain products;
c) the assessment of account activity to detect and prevent fraud;
d) the identification of clients in vulnerable situations so that we can offer them support or protection; and
e) to provide personalised offers and create market insights.

14.2 Profiling is a useful tool as we try to understand our clients and their specific needs in more detail. It gives us the opportunity to use personal information to tailor our marketing and product offering but also to ensure that we achieve fair client outcomes. However, our clients do have rights and entitlements in relation to automated processing and these are covered in Table A above. You also have the right to opt out of profiling for marketing purposes.

Schedule A – Schedule of Purposes of Processing

We will only use and share your information where it is necessary for us to carry out our lawful business activities. Your information may be shared with and processed by other NatWest group companies. We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in a table below:

A. Contractual necessity

We may process your information where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to continue to operate your account and/or provide products and services to you. This may include processing to:

a) assess and process applications for products or services, including applications where you are acting on behalf of one of our clients, such as Power of Attorney;
b) provide and administer those products and services throughout your relationship with the bank, including opening, setting up or closing your accounts or products; collecting and issuing all necessary documentation; executing your instructions; processing transactions, including transferring money between accounts; making payments to third parties; processing data relating to Nectar points where you hold the relevant product; resolving any queries or discrepancies and administering any changes. Calls to our service centre and communications to our mobile and online helplines may be recorded and monitored for these purposes;
c) manage and maintain our relationships with you and for ongoing customer service. This may involve sharing your information with other NatWest group companies to improve the availability of our services, for example enabling clients to visit branches of other NatWest group companies;
d) administer any credit facilities or debts, including agreeing repayment options; and
e) communicate with you about your account(s) or the products and services you receive from us.
f) enforce our terms and conditions, which may involve restricting services, applying limits, or closing your account where you breach those terms.

B. Legal obligation

When you apply for a product or service (and throughout your relationship with us), we are required by law to collect and process certain personal information about you. Please note that if you do not agree to provide us with the requested information, it may not be possible for us to continue to operate your account and/or provide products and services to you. This may include processing to:

a) confirm your identity, (including using biometric information and voice-recognition technology and other identification procedures; for example, fingerprint verification where we have a valid legal basis (e.g., consent);
b) perform checks and monitor transactions and location data for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. This may require us to process information about criminal convictions and offences, to investigate and gather intelligence on suspected financial crimes, fraud and threats and to share data with law enforcement and regulatory bodies;
c) assess affordability and suitability of credit for initial credit applications and throughout the duration of the relationship, including analysing client credit data for regulatory reporting;
d) share data with other banks and third parties to help recover funds that have entered your account as a result of a misdirected payment by such a third party;
e) share data with police, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation, including reporting suspicious activity and complying with production and court orders;
f) deliver mandatory communications to clients or communicating updates to product and service terms and conditions;
g) investigate and resolve complaints, and remediate errors occurring on your account or service;
h) conduct investigations into breaches of conduct and corporate policies by our employees;
i) manage contentious regulatory matters, investigations and litigation;
j) perform assessments and analyse client data for the purposes of managing, improving and fixing data quality;
k) provide assurance that the bank has effective processes to identify, manage, monitor and report the risks it is or might be exposed to;
l) investigate and report on incidents or emergencies on the bank's properties and premises;
m) coordinate responses to business-disrupting incidents and to ensure facilities, systems and people are available to continue providing services;
n) monitor dealings to prevent market abuse; and
o) accessibility and providing reasonable adjustments.
p) assess information relating to customer conduct where required to investigate incidents, comply with health and safety obligations, prevent crime, or respond to requests from law enforcement or regulators.

C. Legitimate interests of the bank

We may process your information where it is in our legitimate interests to do so as an organisation or where it is in the legitimate interest of another NatWest group company or a third party.

a) We (and other NatWest group companies) may process your information in the day-to-day running of our business as a group of companies, to manage our business and financial affairs and to protect our clients, employees and property. It is in our and their interests to ensure that our processes and systems operate effectively and that we can continue operating as a business. This may include processing your information to:
   (i) monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services (for example, confirmation of payee);
   (ii) ensure business continuity and disaster recovery and respond to information technology and business incidents and emergencies;
   (iii) ensure network and information security, including monitoring authorised users' access to our information technology for the purpose of preventing cyber-attacks, unauthorised use of our telecommunications systems and websites, prevention or detection of crime and protection of your personal data;
   (iv) provide assurance on the bank's material risks and reporting to internal management and supervisory authorities on whether the bank is managing them effectively;
   (v) perform general, financial and regulatory accounting and reporting;
   (vi) to make decisions about our clients and the continued operation of their accounts;
   (vii) protect our legal rights and interests and those of the NatWest group of companies;
   (viii) manage and monitor our properties and branches (for example, through CCTV) for the purpose of crime prevention and prosecution of offenders, for identifying accidents and incidents and emergency situations and for internal training;
   (ix) enable a proposed or actual sale, reorganisation, transfer or other transaction relating to our business;
   (x) enable our Payment Services company, Tyl by NatWest, to provide their customers with aggregated, anonymised insights from card holder transactions to help improve the running of their business; and
   (xi) further our purpose to improve our and our clients' environmental impact, including the aim of working towards a carbon neutral position.

b) It is in our interest as a business to ensure that we provide you with the most appropriate products and services and that we continually develop and improve as an organisation. This may require processing your information to enable us to:
   (i) identify new business opportunities and to develop enquiries and leads into applications or proposals for new business and to develop our relationship with you;
   (ii) send you relevant marketing information where you have not opted out (or where you have provided your permission). This may include details of other products or services provided by us, other NatWest Group companies or other selected third parties, which we believe may be of interest to you. We may show or send you marketing material online (on our own and other websites including social media platforms), in our app, or by email, SMS or post. We will not share your information with third parties for their own marketing purposes;
   (iii) understand our clients' actions, behaviour, preferences, transactions, savings, expectations, feedback and financial history in order to improve our products and services, develop new products and services, and to improve the relevance of offers of products and services by NatWest group companies;
   (iv) where you are a corporate and institutional customer, manage and maintain our relationships with you and for ongoing customer service. This may involve sharing your information with other NatWest group companies to improve our services.
   (v) research your experiences with us and to monitor the performance and effectiveness of products and services;
   (vi) assess the quality of our customer services and to provide staff training. Calls to our service centres, video calls and communications to our mobile and online helplines may be recorded and monitored for these purposes;

C. Legitimate interests of the bank

(vii) perform analysis on client complaints for the purposes of preventing errors and process failures and rectifying negative impacts on clients;
(viii) compensate clients for loss, inconvenience or distress as a result of services, process or regulatory failures;
(ix) identify our clients' use of third-party products and services in order to facilitate the uses of client information detailed above;
(x) combine your information with third-party data, such as economic data in order to understand clients' needs better and improve our services;
(xi) consider your welfare needs including any adjustments, support or different products or services which might be suitable or protections to put in place; and
(xii) organise educational events to increase awareness of scams and frauds.
(xiii) we may process personal information, including information obtained from publicly available sources, where necessary to develop, test, train, evaluate, secure and improve our digital services, analytics capabilities and artificial intelligence systems.
(xiv) assess and respond to customer conduct, including behaviour towards our staff, to ensure the safety and wellbeing of our employees, customers and third parties, and to determine whether to restrict, suspend or close an account or limit services in line with our terms and conditions.

c) It is in our interest as a business to manage our risk and to determine what products and services we can offer and the terms of those products and services. It is also in our interest to protect our business and clients and others by preventing financial crime, fraud and other criminal activities. This may include processing your information to:
(i) carry out financial, credit and insurance risk assessments;
(ii) manage and take decisions about your accounts. If you use a third-party eligibility checking service for financial products, we may provide your risk score to confirm your eligibility for the product searched. In relation to corporate and institutional customers we may provide and administer those products and services throughout your relationship with the bank, including opening, setting up or closing your accounts or products; collecting and issuing all necessary documentation; executing your instructions; processing transactions, including transferring money between accounts; making payments to third parties; resolving any queries or discrepancies and administering any changes; administering any credit facilities or debts, including agreeing repayment options with you.
(iii) carry out checks (in addition to statutory requirements) on clients and potential clients, confirmation of payee data business partners and associated persons, including performing adverse media checks, screening against external databases and sanctions lists and establishing connections to politically exposed persons;
(iv) share data with credit reference, fraud prevention agencies and law enforcement agencies;
(v) trace debtors and recovering outstanding debt;
(vi) for risk reporting and risk management;
(vii) perform checks, monitoring and investigation to prevent and detect crime including in relation to money laundering, fraud, terrorist financing, bribery and corruption, trafficking and international sanctions. It may involve screening against internal fraud databases, investigating, gathering and undertaking analysis of intelligence on suspected financial crimes, fraud and threats, organised crime activity and sharing data between banks, card schemes and with law enforcement and regulatory bodies;
(viii) using reliable publicly available information about previous criminal convictions to help identify, assess and investigate potential specific financial crime risks, and to inform intelligence-sharing with law enforcement and industry partners where appropriate
(ix) responding and participating in industry improvements, consultations and initiatives;
(x) responding to and investigating complaints both raised directly to us, or raised through a third party such as a regulatory body;
(xi) share data regarding debts with third-party guarantors; and
(xii) process your biometric data to detect and prevent fraud and unlawful acts, for identification purposes including physical, physiological and behavioural identification, and to authenticate transactions. In certain instances, this is carried out using NuDetect provided by Mastercard (their privacy notice at: **https://www.mastercard.ca/en-ca/vision/corp-responsibility/commitment-to-privacy/global-privacy-policy.html**), or technology provided by Amazon Web Services (on whose behalf we provide this notice) to provide voice verification services by comparing the voice of a caller against previously stored voice data.

D. Consent

Our activities where we may rely on your consent include where we process certain special categories of data (as described in Section 2); where we use cookies or similar technologies (as described in Section 3); or where we collect your permission for sending marketing (as described in Section 9) or any other processing where we request your consent.

If you would like this document in another format such as Braille, large print or audio, please let us know.

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