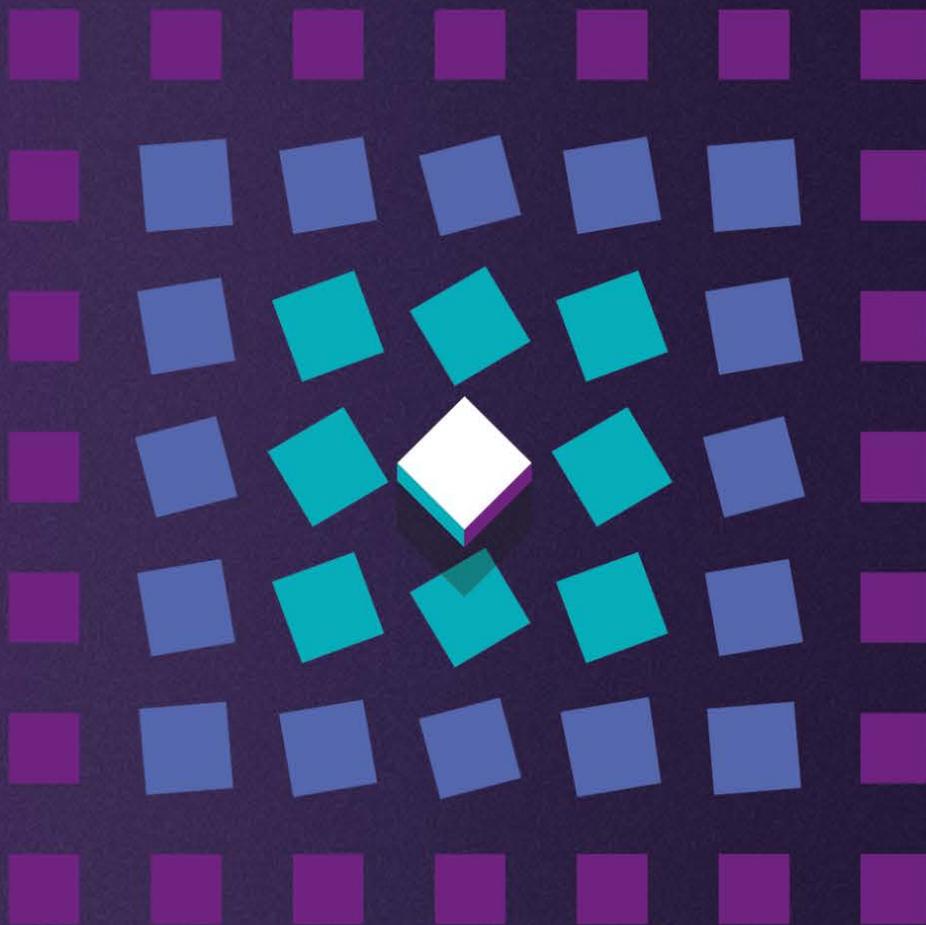


# NatWest Markets Privacy Notice

1 May 2018



**NatWest**  
Markets

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## 1 Who we are

- 1.1. This privacy notice (the "Privacy Notice") applies to all personal information processing activities carried out by the NatWest Markets business of NatWest Markets Plc, National Westminster Bank Plc and NatWest Markets N.V. (together or separately "NatWest Markets").
- 1.2. Each of NatWest Markets Plc, National Westminster Bank Plc and NatWest Markets N.V. is a data controller in respect of personal information that is processed in connection with NatWest Markets (including the products and services that NatWest Markets provides). In this notice, references to "we", "us" or "our" are references to each of NatWest Markets Plc, National Westminster Bank Plc and NatWest Markets N.V. respectively.
- 1.3. The principal address for NatWest Markets Plc and National Westminster Bank Plc is 250 Bishopsgate, London, EC2M 4AA. The principal address of NatWest Markets N.V is 7th Floor, Claude Debussylaan 94, Amsterdam 1082 MD, The Netherlands.
- 1.4. We are a member of The Royal Bank of Scotland Group ("RBS Group"). More information about RBS Group companies (referred to as "Affiliates") can be found at [www.rbs.com](http://www.rbs.com) by clicking on 'About Us'.
- 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 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). We may update our Privacy Notice from time to time, by communicating changes to you and publishing 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.

## 2 The information we process

- 2.1 We collect and process various categories of personal information at the start of and for the duration of your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal information may include:
  - a) basic personal information, including name and address, date of birth and contact details;
  - b) financial information, including account and transactional information and history;
  - c) information about your family, lifestyle and social circumstances (such as dependents, marital status, next of kin and contact details);
  - 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) education and employment information;
  - f) goods and services provided;
  - g) visual images and personal appearance (such as copies of passports or CCTV images); and
  - h) 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.
- 2.2 We may also process certain special categories of information for specific and limited purposes, such as detecting and preventing financial crime or to make our services accessible to customers. 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 set out in Schedule A for which the information is provided). This may include information about:
  - a) racial or ethnic origin;
  - b) religious or philosophical beliefs;
  - c) trade union membership;
  - a) physical or psychological health details or medical conditions; and

- e) biometric information, relating to the physical, physiological or behavioural characteristics of a person including, for example, using voice recognition or similar technologies to help us prevent fraud and money laundering.
- 2.3 Where permitted by law, we may process information about criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions. It may involve investigating and gathering intelligence on suspected financial crimes, fraud and threats and sharing data between banks and with law enforcement and regulatory bodies.

### 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 and your business and the proprietors, officers, agents, employees and beneficial owners of your business and your transactions. It includes:
- a) information you give to us including, for example, information provided by filling in forms or communicating with us whether face-to-face, by phone, letter, email or other forms of electronic communication;
  - i) information we receive from third parties including, for example, Affiliates, the organisation you work for, any organisation where you are the beneficial owner, third parties claiming to be acting with your authority (your agents), third parties who provide services to you or us, and credit reference, fraud prevention or government agencies and other banks (where permitted by law);
  - j) information we learn about you through our relationship with you and the way you operate your accounts and/or services;
  - k) information we gather from the technology which you use to access our services (for example location data from your mobile phone, or an IP address or telephone number) and how you use it (for example pattern recognition); and
  - l) information we gather from publicly available sources, such as the press, the electoral register, company registers and online search engines.

### 4 Your rights

- 4.1 We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described those rights and the circumstances in which they apply, in the table below.
- 4.2 If you wish to exercise any of these rights, or if you have any queries about how we use your personal information which are not answered here, please contact us at [SARS@natwestmarkets.com](mailto:SARS@natwestmarkets.com) or by post at NatWest Markets SARs, 250 Bishopsgate, London, EC2M 4AA.
- 4.3 Our NatWest Markets Privacy Officer can be contacted at [NWMPPrivacyOfficer@natwestmarkets.com](mailto:NWMPPrivacyOfficer@natwestmarkets.com) or by post at NatWest Markets Privacy Officer, 250 Bishopsgate, London, EC2M 4AA. Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue to operate your account and/or provide certain products and services to you.
- 4.4 Where required, we will adhere to applicable legal and regulatory data protection requirements in any jurisdiction in which we are established for the purposes of those requirements ("Local Jurisdiction"). To the extent that this Privacy Notice conflicts with the data protection requirements in any Local Jurisdiction, the data protection requirements of that Local Jurisdiction will take precedence.

## Table A – Your Rights

Rights	Description
<p><b>Access</b> - You have a right to access the personal information we hold about you. You have a right to get access to the personal information we hold about you.</p>	<p>If you would like a copy of the personal information we hold about you, please write to: <a href="mailto:SARS@natwestmarkets.com">SARS@natwestmarkets.com</a> or contact us by post at NatWest Markets SARs, 250 Bishopsgate, London, EC2M 4AA.</p> <p>For more information on how to access your information and the documents we need you to submit to request access, please visit our <a href="#">website</a>.</p>
<p><b>Rectification</b> – You have a right to request that inaccurate personal information be rectified and incomplete personal information updated.</p>	<p>If you believe that any of the information 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.</p> <p>Please note that if you ask us to restrict the processing of your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<p><b>Erasure</b> - You have a right to request that we delete your personal information.</p>	<p>You may request that we delete your personal information if:</p> <ul style="list-style-type: none"> <li>you believe we no longer need to process your information for the purposes it was provided for;</li> <li>we have requested your permission to process your personal information and you wish to withdraw your consent; or</li> <li>you believe we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you ask us to delete your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<p><b>Restriction</b> – You have a right to ask us to restrict the processing of your personal information.</p>	<p>You may ask us to restrict the processing of your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>any of the information we hold about you is inaccurate;</li> <li>we no longer need to process your information for the purposes it was provided for, but you require the information to establish, exercise or defend legal claims; or</li> <li>we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you ask us to restrict the processing of your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<p><b>Portability</b> – You have a right to data portability.</p>	<p>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, in a portable format, the personal information you provided to us.</p> <p>You may also ask us to provide it directly to a third party, if technically feasible. We are not responsible for such third party's use of your account information, which will be governed by such third party's agreement with you and any privacy statement it provides to you.</p> <p>If you would like to ask for the personal information you provided to us to be sent to you in a portable format, please write to or contact us at: <a href="mailto:SARS@natwestmarkets.com">SARS@natwestmarkets.com</a> or by post at NatWest Markets SARs, 250 Bishopsgate, London, EC2M 4AA.</p>
<p><b>Objection</b> – You have a right to object to the processing of your personal information.</p>	<p>You have a right to object to us processing your personal information (and to ask us to restrict processing) for the purposes described in Section B (Legitimate interests of the data controller), 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.</p> <p>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.</p>
<p><b>Marketing</b> – You have a right to object to direct marketing</p>	<p>You have a right to object, at any time, to the processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing. For more information see section 9 below Marketing Information.</p>
<p><b>Withdraw consent</b> – You have a right to withdraw your consent.</p>	<p>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.</p>

<p><b>Lodge complaints</b> – You have a right to lodge a complaint with the regulator</p>	<p>If you wish to raise a complaint about how we have handled your personal information, you can contact the NatWest Markets Privacy Officer at <a href="mailto:NWMPPrivacyOfficer@natwestmarkets.com">NWMPPrivacyOfficer@natwestmarkets.com</a> or by post to NatWest Markets Privacy Officer, 250 Bishopsgate, London, EC2M 4AA who will investigate the matter. We hope that we can address any concerns you may have, but you can always contact the relevant data protection authority. For more information please visit:</p> <ul style="list-style-type: none"> <li>• Singapore: <a href="https://www.pdpc.gov.sg/">https://www.pdpc.gov.sg/</a></li> <li>• Japan: <a href="https://www.ppc.go.jp/en/">https://www.ppc.go.jp/en/</a></li> <li>• Hong Kong: <a href="https://www.pcpd.org.hk/">https://www.pcpd.org.hk/</a></li> <li>• Netherlands: <a href="https://autoriteitpersoonsgegevens.nl/en">https://autoriteitpersoonsgegevens.nl/en</a></li> <li>• Ireland: <a href="https://www.dataprotection.ie/">https://www.dataprotection.ie/</a></li> <li>• United Kingdom: <a href="https://ico.org.uk/">https://ico.org.uk/</a></li> </ul>
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## 5 Changes to the way we use your information

From time to time we may change the way we use your information. 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 the changes it may not be possible for us to continue to operate your account and/or provide certain products and services to you.

## 6 How we use and share your information with other RBS Group companies

We will only use and share your information where it is necessary for us to lawfully carry out our business activities. Your information may be shared with and processed by other RBS 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 – Schedule of Purposes of Processing.

## 7 Sharing with third parties

7.1 We will not share your information with anyone outside of RBS Group except:

- a) where we have your (or your agent's) express or implied permission;
- b) where required for your product or service;
- c) where we are required to by law or by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- d) 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 a third party;
- e) with third parties providing services to us, such as market analysis and benchmarking, correspondent banking, and agents and sub-contractors acting on our behalf, such as the companies which print any account statements;
- f) 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;
- g) with debt collection agencies;
- h) with credit reference and fraud prevention agencies;
- i) with third party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- j) 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;
- k) in anonymised form as part of statistics or other aggregated data shared with third parties; or
- l) here 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 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.
- 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 link your assets and liabilities with your immediate family under a Fee Family, the sum of the combined assets and liabilities held within the Fee Family may be shared with other members of the Fee Family. In some instances this may allow other members of the Fee 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.

## 8 Transferring information overseas

- 8.1 We may transfer your information to organisations in other countries (including to other RBS Group companies) provided that the organisation to whom we pass it protects it in the same way we would and in accordance with applicable regulations which shall include Financial Conduct Authority ("FCA") and Prudential Regulation Authority ("PRA") Rules, the rules of any other relevant regulatory authority or exchange and any applicable laws, rules, procedures, guidance, codes, standards and regulations (including, without limitation, accounting rules and anti-money laundering and sanctions legislation) in force from time to time ("Applicable Regulations").
- 8.2 In the event that we transfer information to countries outside of the EEA (which consists of countries in the European Union as well as Iceland, Liechtenstein and Norway), we will only do so where:
- the European Commission has decided that the country or the organisation we are sharing your information with will protect your information adequately; or
  - the transfer has been authorised by a relevant data protection authority; or
  - we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the European Commission) to ensure your information is adequately protected. If you wish to obtain a copy of the relevant data protection clauses or would like more information generally about transfers of information outside of the EEA, please contact us at [NWMPrivacyOfficer@natwestmarkets.com](mailto:NWMPrivacyOfficer@natwestmarkets.com) by post to NatWest Markets Privacy Officer, 250 Bishopsgate, London, EC2M 4AA.

## 9 Marketing information

- 9.1 Unless you have told us that you do not want to hear from us, we may send you relevant marketing information (including details of other products or services provided by us or other RBS Group companies which we believe may be of interest to you) by post, phone, email and/or other forms of electronic communication. 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 tell us at any time by contacting us at [SARS@natwestmarkets.com](mailto:SARS@natwestmarkets.com) or by post at NatWest Markets SARs, 250 Bishopsgate, London, EC2M 4AA.

## 10 Communication about your account

- 10.1 If you are a customer of ours or act on behalf of a customer of ours, we will contact you with information relevant to the operation and maintenance of your account or the account of our customer with whom you are associated (including updated information about how we process your personal information), by a variety of means including post and/or telephone or other electronic communication approved by our communications policy. If you change your contact details at any point in the future, you should tell us promptly about those changes.
- 10.2 Electronic communications and telephone conversations between us and you may be monitored and/ or recorded for training purposes, internal investigations, to check instructions, for legal reasons or to meet Applicable Regulations. Those recordings may be used by us in evidence in the event of a dispute with you or our customer with whom you are associated. A copy of the recordings of such conversations and communications between us and you will be available to you upon request for a period of five years and in some cases, where requested by the FCA or another relevant regulatory authority, for a period of up to seven years.

## 11 Credit reference and fraud prevention agencies

- 11.1 We may access and use information from credit reference and fraud prevention agencies at the start of our relationship with a customer and periodically to:
- manage and take decisions about our customer's accounts, including assessing an individual's creditworthiness and checks to avoid customers becoming over-indebted;
  - prevent criminal activity, fraud and money laundering;
  - check the identity of the customer and its representatives and owners and verify the accuracy of the information you provide to us; and
  - trace debtors and recover debts.
- 11.2 While you have a relationship with us, we may share information with credit reference agencies about how our customers manage their account including their account balance, payments into your account, the regularity of payments being made, credit limits and any arrears or default in making payments. This information will be made available to other organisations (including fraud prevention agencies and other financial institutions) so that they can take decisions about the customer, its associates and (where our customer is an individual) members of its household.
- 11.3 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.
- 11.4 If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services and financing you have requested, or we may stop providing existing services to you.
- 11.5 Application decisions may be taken based solely on automated checks of information from credit reference and fraud prevention agencies and internal RBS records. You have rights in relation to automated decision making, including a right to appeal if your application is refused.
- 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 When credit reference and fraud prevention agencies process your information, they do so on the basis that they have a legitimate interest in preventing fraud and money laundering, to verify identity and in order to protect their business and/or to comply with laws that apply to them. Further information about credit reference agencies, how they use personal information, and financial connections and how they may be ended, can be obtained from the credit reference agencies: Experian ([www.experian.co.uk/crain](http://www.experian.co.uk/crain)), Equifax ([www.equifax.co.uk/crain](http://www.equifax.co.uk/crain)) and Callcredit ([www.callcredit.co.uk/crain](http://www.callcredit.co.uk/crain) )
- 11.8 If you would like a copy of the information held about you by the credit reference and fraud prevention agencies we use, or if you want further details of how your information will be used by credit reference agencies please visit their websites or contact them using the details below. The agencies may charge a fee.
- 11.9

Credit reference agency	Contact details
Callcredit Limited ( <a href="http://www.callcredit.co.uk/crain">www.callcredit.co.uk/crain</a> )	<p><b>Post:</b> Callcredit Information Group, One Park Lane, Leeds, West Yorkshire LS3 1EP.</p> <p><b>Website:</b> <a href="http://www.callcredit.co.uk/consumer-solutions/contact-us">http://www.callcredit.co.uk/consumer-solutions/contact-us</a></p> <p><b>Email:</b> <a href="mailto:consumer@callcreditgroup.com">consumer@callcreditgroup.com</a></p> <p><b>Phone:</b> 0330 024 7574</p>
Equifax Limited	<p><b>Post:</b> Equifax Ltd, Customer Service Centre PO Box 10036, Leicester, LE3 4FS.</p> <p><b>Website:</b> <a href="https://www.equifax.co.uk/Contact-us/Contact Us Personal Solutions.html">https://www.equifax.co.uk/Contact-us/Contact Us Personal Solutions.html</a></p>

	<b>Email:</b> <a href="http://www.equifax.co.uk/ask">www.equifax.co.uk/ask</a> <b>Phone:</b> 0333 321 4043 or 0800 014 2955
Experian Limited	<b>Post:</b> Experian, PO BOX 9000, Nottingham, NG80 7WF <b>Website:</b> <a href="http://www.experian.co.uk/consumer/contact-us/index.html">http://www.experian.co.uk/consumer/contact-us/index.html</a> <b>Email:</b> <a href="mailto:consumer.helpservice@uk.experian.com">consumer.helpservice@uk.experian.com</a> <b>Phone:</b> 0344 481 0800 or 0800 013 8888
The Central Credit Register	<b>Website:</b> <a href="https://www.centralcreditregister.ie/">https://www.centralcreditregister.ie/</a> <b>Email:</b> <a href="mailto:consumerinfo@centralcreditregister.ie">consumerinfo@centralcreditregister.ie</a> <b>Phone:</b> +353 (0)1 224 5500
The Irish Credit Bureau	<b>Post:</b> ICB House, Newstead, Clonskeagh Road, Dublin 14, d14PX09 <b>Website:</b> <a href="http://www.icb.ie/">http://www.icb.ie/</a> <b>Phone:</b> +353 01 2600388

## 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 customer 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 in different formats.
- 12.2 We manage our records to help us to serve our customers 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 serve 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 RBS Group company is located and Applicable Regulations. We (and our Affiliates) normally keep customer account records for a defined period after your relationship with NatWest Markets ends. 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 NatWest Markets 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 [NWMPPrivacyOfficer@natwestmarkets.com](mailto:NWMPPrivacyOfficer@natwestmarkets.com) by post to NatWest Markets Privacy Officer, 250 Bishopsgate, London, EC2M 4AA.

## 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 <https://personal.natwest.com/personal/security-centre.html>.

## Schedule A - Schedule of Purposes of Processing

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

## A. 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;
- 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, market abuse 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 customer 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 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 communication to customers or communicating updates to product and service terms and conditions.
- g) investigate and resolve complaints;
- 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 customer data for the purposes of managing, improving and fixing data quality;
- k) provide assurance that NatWest Markets 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 properties and premises of NatWest Markets; and
- m) coordinate responses to business disrupting incidents and to ensure facilities, systems and people are available to continue providing services.

## B. Legitimate interests of the data controller

We may process your information where it is in our legitimate interests to do so as an organisation and without prejudicing your interests or fundamental rights and freedoms. More information on how we have balanced our legitimate interests against your fundamental rights and freedoms is available to you on your request.

- a) 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:
- i) assess and process applications for products or services;
  - ii) provide and administer those products and services throughout your relationship with us, 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. Electronic communications sent to us and telephone conversations with us may be monitored and/or recorded for training purposes, internal investigations, legal reasons, to check instructions, or to meet regulatory requirements. Those recordings may be used by us in evidence in the event of a dispute. A copy of any recordings of such conversations and communications between you and us will be available to you upon request for a period of five years and in some cases, where requested by the FCA or another relevant regulatory authority, for a period of up to seven years;
  - iii) develop, manage and maintain our relationship with you and for ongoing customer service;
  - iv) administer any credit facilities or debts, including agreeing repayment options; and
  - v) communicate with you about your account(s) or the products and services you receive from us.
- b) We may process your information in the day-to-day running of our business, to manage our business and financial affairs and to protect our customers, employees and property. It is in our interests to ensure our processes and systems operate effectively and that we can continue operating as a business. This may include processing your information to:
- vi) monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;
  - vii) ensure business continuity and disaster recovery and responding to information technology and business incidents and emergencies;
  - viii) 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;
  - ix) provide assurance on NatWest Markets' material risks and reporting to internal management and supervisory authorities on whether NatWest Markets is managing them effectively;
  - x) perform general, financial and regulatory accounting and reporting;
  - xi) protect our legal rights and interests;
  - xii) 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; and
  - xiii) enable a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business.
- c) 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;
  - ii) send you relevant marketing information (including details of other products or services provided by us or other RBS Group companies which we believe may be of interest to you).
  - iii) understand our customers' actions, behaviour, preferences, 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 RBS Group companies;

- iv) monitor the performance and effectiveness of products and services;
- v) assess the quality of our customer services and to provide staff training. Calls to our service centres and communications to our mobile and online helplines may be recorded and monitored for these purposes;
- vi) perform analysis on customer complaints for the purposes of preventing errors and process failures and rectifying negative impacts on customers;
- vii) compensate customers for loss, inconvenience or distress as a result of services, process or regulatory failures;
- viii) identify our customers' use of third party products and services in order to facilitate the uses of customer information detailed above; and
- ix) combine your information with third party data, such as economic data in order to better understand customers' needs and improve our services.

We may perform data analysis, data matching and profiling to support decision making about the activities mentioned above. It may also involve sharing information with third parties who provide a service to us.

- d) 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 by preventing financial crime. This may include processing your information to:
  - i) carry out financial, credit and insurance risk assessments;
  - x) manage and take decisions about your accounts;
  - xi) carry out checks (in addition to statutory requirements) on customers and potential customers, business partners and associated persons, including performing adverse media checks, screening against external databases and sanctions lists and establishing connections to politically exposed persons;
  - xii) share data with credit reference, fraud prevention agencies and law enforcement agencies;
  - xiii) trace debtors and recover outstanding debt; and
  - xiv) carry out risk reporting and risk management.

Application decisions may be taken based on solely automated checks of information from credit reference agencies and our internal records. For more information on how we access and use information from credit reference and fraud prevention agencies see Section 11 above – Credit reference and fraud prevention agencies in this document.