

# RBS Social & Community Capital

## Privacy Notice

### 1. Who we are

- 1.1. This privacy notice (the “Privacy Notice”) applies to all personal information processing activities carried out by RBS Social & Community Capital.
- 1.2. National Westminster Bank Plc is the data controller for RBS Social & Community Capital in respect of personal information that we process in connection with our charity. In this notice references to “we”, “us” or “our” are references to RBS Social & Community Capital.
- 1.3. Our principal address is 250 Bishopsgate, London, EC2M 4AA.
- 1.4. We are an associated company of The Royal Bank of Scotland Group plc (“RBS group”) that is run independently by a Board of Trustees. More information about RBS Social & Community Capital can be found [here](#).
- 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 funding. “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 this Privacy Notice from time to time. When we do we will publish the updated Privacy Notice on the RBS Social & Community Capital website.

### 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) education and employment information;
  - d) goods and services provided;
  - e) visual images and personal appearance (such as copies of passports or CCTV images); and
  - f) online profile and social media information and activity, based on your interaction with us and our websites and applications, including for example Internet Protocol (IP) address, mobile phone network information, searches and site visits.
- 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’ve obtained your explicit consent or are otherwise lawfully permitted to do so (and then only for the particular purposes and activities set out at Schedule A for which the information is provided). This may include:
  - a) information about racial or ethnic origin;
  - b) religious or philosophical beliefs;
  - c) trade union membership;
  - d) 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



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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. The information we hold about you and your organisation is made up of all the financial and personal information we collect and hold about you and your organisation. It includes:
- information you give to us;
  - information that we receive from your organisation in support of providing a loan or grant;
  - information that we learn about you and your organisation through our relationship with you and the way you operate your loan account or grant funding;
  - information that we gather through cookies or similar tracking tools (e.g. pixels) when you use our websites. Advertising or targeting cookies or similar technologies may also be used 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;
  - information that 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

f) information that we gather from publicly available sources, such as the press, the electoral register, company registers and online search engines. Information that you make public on social media e.g. Facebook, Twitter.

### 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.

If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain to our Data Protection Officer, please contact us at 0207 672 1411. **Overseas number:** +44 207 672 1411.

- 4.2. 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 provide certain products and services to you.

### 5. Changes to the way we use your information

From time to time we may change the way we use your

Rights	Description
<b>Access</b> – You have a right to get access to the personal information we hold about you.	<p>If you would like a copy of the personal information we hold about you, please contact us at 0207 672 1411. <b>Overseas number:</b> +44 207 672 1411.</p> <p>For more information on how to get access to your information and the documents we need you to submit, please visit our website at: <a href="http://supportcentre.natwest.com/Searchable/959249182/How-do-I-submit-a-Subject-Access-Request-SAR.htm">supportcentre.natwest.com/Searchable/959249182/How-do-I-submit-a-Subject-Access-Request-SAR.htm</a></p> <p>Or write to: RBS Social &amp; Community Capital, Subject Access Requests 250 Bishopsgate, London EC2M4AA</p>
<b>Rectification</b> – You have a right to rectification of inaccurate personal information and to update incomplete personal information.	<p>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.</p> <p>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.</p>
<b>Erasure</b> – You have a right to request that we delete your personal information.	<p>You may request that we delete your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>we no longer need to process your information for the purposes for which it was provided;</li> <li>we have requested your permission to process your personal information and you wish to withdraw your consent; or</li> <li>we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request us to delete your information, we may have to suspend the operation of the loan account or grant funding we provide to you.</p>

<b>Restriction</b> – You have a right to request us to restrict the processing of your personal information.	<p>You may request us to restrict processing your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>• any of the information that we hold about you is inaccurate;</li> <li>• 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</li> <li>• we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request us to restrict processing your information, we may have to suspend the operation of the loan account or grant funding we provide to you.</p>
<b>Portability</b> – You have a right to data portability.	<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 the personal information you provided to us in a portable format.</p> <p>You may also request us to provide it directly to a third party, if technically feasible. We're 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.</p> <p>If you would like to request the personal information you provided to us in a portable format, please contact us at 0207 672 1411. <b>Overseas number:</b> +44 207 672 1411</p> <p>Or write to: RBS Social &amp; Community Capital, Subject Access Requests, 250 Bishopsgate, London EC2M4AA</p>
<b>Objection</b> – You have a right to object to the processing of your personal information.	<p>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.</p> <p>Depending on the circumstances, we may need to restrict or cease processing your personal information altogether, or, where requested, delete your information.</p> <p>Please note that if you object to us processing your information, we may have to suspend the operation of the loan account or grant funding we provide to you.</p>
Marketing – You have a right to object to direct marketing.	<p>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.</p>
<b>Withdraw consent</b> – You have a right to withdraw your consent.	<p>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.</p>
<b>Lodge complaints</b> – You have a right to lodge a complaint with the regulator.	<p>If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer who will investigate the matter. We hope that we can address any concerns you may have, but you can always contact the Information Commissioner's Office (ICO).</p> <p>For more information, visit <a href="http://ico.org.uk">ico.org.uk</a>.</p>

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 such changes it may not be possible for us to continue to provide certain products and services to you.

## 6. How we use and share your information

We will only use and share your information where it is necessary for us to lawfully carry out our business activities. Your information will be shared by RBS Social & Community Capital with our Credit Panel which is made up of RBS group employees and external volunteers as part of the loan or grant assessment process. We would never share nor have information processed by other RBS group companies. We only share information with Street UK to allow our loan accounts to be set up which includes name, address, telephone number of who we are lending to. A point of contact and the terms of the loan to allow them to open the account and the direct debit mandate for Street UK to set up and collect the funds per the loan agreement. 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 third parties

7.1. We will not share your information with anyone outside RBS Social & Community Capital except:

- a) where we have your permission;
- b) where required for your product or service;
- c) where we are required by law and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world;
- d) with third parties providing services to us, such as legal firms preparing documentation for us;
- e) with debt collection agencies;
- f) fraud prevention agencies;
- g) with third-party guarantors or other companies that provide you with benefits or services (such as insurance cover) associated with your product or service;
- h) 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;
- i) in anonymised form as part of statistics or other aggregated data shared with third parties; or
- j) 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. RBS Social & Community Capital 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) 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 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 European Commission 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 European Commission) to ensure your information is adequately protected. If you wish to obtain a copy of the relevant data protection clauses, please contact us at 0207 672 1411. **Overseas number:** +44 207 672 1411.

## 9. Marketing information

Unless you have told us that you do not want to hear from us, we will 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). 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 0207 672 1411, **Overseas number:** +44 207 672 1411

## 10. Communications about your loan or grant

- 10.1. We will contact you with information relevant to the operation and maintenance of your loan or grant funding (including updated information about how we process your personal information), by a variety of means including via email, text 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 or other communications in accordance with applicable laws for the purposes outlined in Schedule A – Purposes of Processing.

## 11. Fraud prevention agencies

- 11.1. We may access and use information from fraud prevention agencies when you take out a loan with us or receive grant funding and periodically to:
  - a) prevent criminal activity, fraud and money laundering;
  - b) check your identity and verify the accuracy of the information you provide to us; and
  - c) trace debtors and recover debts.
- 11.2. 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.
- 11.3. 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.

- 11.4. 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.
- 11.5. If you would like a copy of your information held by the 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.

<b>Fraud Prevention Agency</b>	<b>Contact details</b>
CIFAS ( <a href="https://www.cifas.org.uk/privacy-notice">https://www.cifas.org.uk/privacy-notice</a> )	<b>Post:</b> Consumer Affairs, Cifas, 6th Floor, Lynton House, 7-12 Tavistock Square, London WC1H 9LT <b>Email:</b> <a href="mailto:cifas.org.uk/fpn">cifas.org.uk/fpn</a> Phone: 0330 100 0180
National Hunter Ltd( <a href="https://www.nhunter.co.uk/privacypolicy/">https://www.nhunter.co.uk/privacypolicy/</a> )	<b>Post:</b> National Hunter Ltd, PO Box 4744, Stone, Staffordshire ST15 9FE <b>Website:</b> <a href="http://nhunter.co.uk/contactus/">nhunter.co.uk/contactus/</a> <b>Email:</b> <a href="mailto:info@nhunter.co.uk">info@nhunter.co.uk</a>

## 12. How long we keep your information

- 12.1. By providing you with a loan or grant, 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 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 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 RBS company is located and the applicable local legal or regulatory requirements. We (and other RBS group companies) normally keep customer 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're needed.
- 12.5. If you would like more information about how long we keep your information, please contact us at 0207 672 1411. **Overseas number:** +44 207 672 1411

## 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 [personal.rbs.co.uk/personal/security-centre.html](http://personal.rbs.co.uk/personal/security-centre.html) or contact us at 0207 672 1411. **Overseas number:** +44 207 672 1411