

# NatWest Social & Community Capital

# Privacy Notice



NatWest

## Contents

Who we are	2
The information we process	2
How we obtain information	2
Your rights	2
Table A – Your Rights	3
Changes to the way we use your information	4
How we use and share your information	4
Sharing with third parties	4
Transferring information overseas	4
Marketing information	5
Communications about your loan or grant funding	5
Fraud prevention agencies	5
How long we keep your information	5
Security	5

## Schedule A – Schedule of Purposes of Processing

A Contractual necessity	6
B Legal obligation	6
C Legitimate interests of the charity	7

## 1. Who we are

- 1.1. This privacy notice (the “Privacy Notice”) applies to all personal information processing activities carried out by NatWest Social & Community Capital.
- 1.2. NatWest Social & Community Capital 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 to NatWest Social & Community Capital.
- 1.3. Our principal address is 250 Bishopsgate, London EC2M 4AA and our contact details can be located at [www.natwest.com/scc](http://www.natwest.com/scc).
- 1.4. Social & Community Capital is a charity funded and supported by NatWest Group plc (“NatWest group”) in order to help social enterprises and community businesses. More information about NatWest Social & Community Capital can be found at [www.natwest.com/scc](http://www.natwest.com/scc).
- 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. 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.

## 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) education and employment information;
  - c) visual images and personal appearance (such as copies of passports or driving licences); and
- 2.2. 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 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/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 your organisation in support of providing a loan or grant;
  - c) information that we learn about you and your organisation through your relationship with you and the way you operate your loan account or grant funding;
  - d) 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;
  - e) 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, 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 2076721411.

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 loan or grant funding to provide certain products and services to you. NatWest Social & Community Capital 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 to NatWest Social & Community Capital.

## Table A – Your Rights

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. Overseas number: +44 2076721411.</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://www.natwest.com/scc">www.natwest.com/scc</a>.</p> <p>Or write to: NatWest Social &amp; Community Capital, Subject Access Requests, 4 Almondvale South, Livingston, EH54 6NB.</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 organisation’s loan or grant funding 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 your organisation’s loan or grant funding and/or the products and services 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>• <b>any</b> 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 your organisation’s loan account or grant funding and/or the products and services 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 loan or grant 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 0206 672 1411. Overseas number: +44 207 672 1411. Or visit our website at: <a href="http://www.natwest.com/scc">www.natwest.com/scc</a>.</p> <p>Or write to: NatWest Social &amp; Community Capital, Subject Access Requests, 4 Almondvale South, Livingston, EH54 6NB.</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 your organisations’s loan or grant funding and/or the products and services 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>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>
<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). For more information, visit <a href="http://ico.org.uk">ico.org.uk</a></p>

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

5.1. 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 such changes it may not be possible for us to continue to operate your organisation’s loan or grant funding and/or provide certain products and services to you.

## 6. How we use and share your information

6.1. 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 NatWest Social & Community Capital with our Credit Panel which is made up of NatWest group employees and external volunteers as part of the loan or grant assessment process. We would never share nor have information processed by other NatWest group companies. We only share information with CU Soar Limited 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 allow them to open the account and the direct debit mandate for CU Soar Limited to set up and collect the funds per the loan agreement. We want you 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 NatWest 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. NatWest 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 organisation’s in other countries 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 02076721411. Overseas number: +44 207 672 1411.

## 9. Marketing information

- 9.1. Unless you have told us that you do not want to hear from us, we will send you relevant marketing information by mail, phone, email, text and 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 0207 672 1411. Overseas number: +44 207 672 1411, or via email [natwestscc@natwest.com](mailto:natwestscc@natwest.com).

## 10. Communications about your loan or grant funding

- 10.1. We will contact you with information relevant to the operation and maintenance of your organisation's loan or grant funding (including updated information about how we process your personal information), by a variety of means including via email, 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 emails, text passages 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:
- prevent criminal activity, fraud and money laundering;
  - check your identity and verify the accuracy of the information you provide to us; and
  - 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 organisation's 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.

Credit reference Agency	Contact details
Equifax Limited ( <a href="http://equifax.co.uk/crain">equifax.co.uk/crain</a> )	<b>Post:</b> Equifax Ltd, Customer Service Centre, PO Box 10036, Leicester LE3 4FS. <b>Website:</b> <a href="http://equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html">equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html</a> <b>Email:</b> <a href="mailto:equifax.co.uk/ask">equifax.co.uk/ask</a> <b>Phone:</b> 0333 321 4043 or 0800 014 2955
Experian Limited ( <a href="http://experian.co.uk/crain">experian.co.uk/crain</a> )	<b>Post:</b> Experian, PO BOX 9000, Nottingham NG80 7WF <b>Website:</b> <a href="http://experian.co.uk/consumer/contact-us/index.html">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
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>Website:</b> <a href="http://cifas.org.uk/fpn">cifas.org.uk/fpn</a> <b>Phone:</b> 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 2756, Stoke-on-Trent, Staffordshire ST6 9AQ <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>
Dun and Bradstreet ( <a href="https://www.dnb.co.uk/utility-pages/privacy-policy.html">https://www.dnb.co.uk/utility-pages/privacy-policy.html</a> )	<b>Post:</b> Marlow International, Parkway, Marlow, Bucks. SL7 1AJ <b>Website:</b> <a href="http://www.dnb.co.uk">www.dnb.co.uk</a> <b>Phone:</b> 0800 001 234
TransUnion ( <a href="https://www.transunion.co.uk/legal/privacy-centre">https://www.transunion.co.uk/legal/privacy-centre</a> )	<b>Post:</b> Consumer Service Team, PO Box 491, Leeds LS3 1WZ <b>Website:</b> <a href="http://www.transunion.co.uk">www.transunion.co.uk</a> <b>Phone:</b> 0330 024 7579

## 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 loan or grant) 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 company is located and the applicable local legal or

regulatory requirements. We normally keep customer account records for up to ten years after your relationship with the charity 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 charity 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 0206 672 1411. Overseas number: +44 207 672 1411. 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

- 13.1. 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 contact us at 0207 672 1411. Overseas number: +44 207 672 14144.

#### 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. 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 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 loan or grant 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 loan or grant and/or provide services to you. This may include processing to:

- a) assess and process applications for loans or grants;
- b) provide and administer those products and services throughout your relationship with the charity, including opening, setting up or closing your loan or grant funding; 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.
- c) manage and maintain our relationships with you and for ongoing customer service;
- d) administer any credit facilities or debts, including agreeing repayment options; and
- e) communicate with you about your loan(s), grant or the products and services you receive from us.

##### B Legal obligation

When you apply for a loan or grant (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 organisation's loan or grant and/or provide products and services to you. This may include processing to:

- a) confirm your identity;
- 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) 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;
- d) deliver mandatory communications to customers or communicating updates to loan product and service terms and conditions;
- e) investigate and resolve complaints;
- f) conduct investigations into breaches of conduct and corporate policies by our employees;
- g) manage contentious regulatory matters, investigations and litigation;
- h) perform assessments and analyse customer data for the purposes of managing, improving and fixing data quality;
- i) provide assurance that the charity has effective processes to identify, manage, monitor and report the risks it is or might be exposed to;
- j) investigate and report on incidents or emergencies on the charity's properties and premises that it uses;
- k) coordinate responses to business-disrupting incidents and to ensure facilities, systems and people are available to continue providing services; and
- l) monitor dealings to prevent market abuse.

## C Legitimate interests of the charity

We may process your information where it is in our legitimate interests do so as an organisation and without prejudicing your interests or fundamental rights and freedoms.

- a) 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 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 responding 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 charity's material risks and reporting to internal management and supervisory authorities on whether the charity is managing them effectively;
  - (v) perform general, financial and regulatory accounting and reporting;
  - (vi) protect our legal rights and interests;
  - (vii) enable a sale, reorganisation, transfer or other transaction relating to our business.
- 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 (including details of other products or services provided by us 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), by email, sms or post;
  - (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 NatWest Social & Community Capital;
  - (iv) monitor the performance and effectiveness of products and services;
  - (v) assess the quality of our customer services and to provide staff training;
  - (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) combine your information with third-party data, such as economic data in order to understand customers' needs better and improve our services.
- 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 by preventing financial crime. This may include processing your information to:
- (i) carry out financial, credit and insurance risk assessments;
  - (ii) manage and take decisions about your accounts;
  - (iii) 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;
  - (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.

For more information on how we access and use information from fraud prevention agencies see Section 11 – Fraud prevention agencies in this document.