

# NatWest Group Retirement Savings Plan - Privacy Notice

## Information about the Trustee

The NatWest Group Retirement Savings Plan (the '**RSP**') has been set up under a trust. This means that it is looked after by NatWest Group Retirement Savings Trustee Limited, as Trustee of the RSP.

NatWest Group Retirement Savings Trustee Limited ("**Trustee**", "**we**", "**our**", or "**us**") is a "data controller" under the data protection laws. It is committed to protecting your information and acting in accordance with your rights under those laws.

The purpose of this privacy notice is to inform you of what personal information we collect, what we do with that information, and what rights you have. If you have any questions, please contact us using the information at the bottom of this notice.

## Information about the RSP

The RSP is a 'defined contribution' pension plan with associated Life Cover. The pension plan is administered by Legal & General. Life Cover is provided by Zurich.

All employees of the NatWest Group in the UK, Jersey, Guernsey, Isle of Man and Gibraltar who are not members of the bank's defined benefit pension scheme will be members of the RSP.

## Information about Life Cover

All members of the RSP are required to have Life Cover, including those not making contributions to the RSP.

For the purposes of Life Cover, the bank (as an employer) provides Zurich with the personal data necessary for them to administer this cover on the basis that it has a legitimate interest in doing so.

## Collection of your information

We collect and process the following information about you:

- your personal details such as your name, gender, date of birth, residential address including postcode, national insurance number, bank account details (in some cases), and country of residence;
- your contact information such as your telephone number and email address;
- information relating to your benefits, including your member identifying number (which is assigned to you by the RSP), the date on which your pensionable service started, the date you joined or left the RSP, your earnings, the category or membership class and value of contributions and benefits that you receive, details of your investments (including the amounts, splits and units purchased and sold), details of your lifestyle investment strategy (if applicable), your target retirement age and other information you submit via Manage Your Account, and any relevant matters impacting your benefits such as voluntary contributions, pension sharing orders or earmarking orders, tax protections or other adjustments;
- records of communications with you (including any complaints);
- in some cases, where required in order to administer your pension, special categories of personal data such as your marital status or information concerning your health (e.g. in the case of ill-health early retirement and ill-health reviews, and where incapacity or

similar reasons determine the benefits paid to you). We will only do so where we have your express consent, unless we have an alternative legal basis for processing this information under the data protection laws (for example under employment, social security or social protection law or where it is necessary for the purposes of making a determination in connection with eligibility for, or benefits payable under, an occupational pension scheme). If you have given your consent you can withdraw it at any time by using the contact details set out at the end of this notice.

The accuracy of the information that we hold about you is important to us. If any of the information that we hold about you is inaccurate or out of date, please let us know using the contact details set out at the end of this notice.

In some cases, this information is collected by the RSP's administrators, currently Legal & General, on our behalf. Some of the information may also be collected directly from NatWest, including (if you are an employee of the bank when you update your details via the bank's HR portal, Workday).

Where applicable, we also collect information about your dependents or next of kin (for example, when you submit your Nomination of Beneficiary Form). Before providing us or our administrators with any such information, you must provide a copy of the information in this notice to those individuals.

### **How we use your information**

We use your information for the following purposes:

- a) communicating with you in relation to your benefits and contributions, handling requests for transfers and allocation of death benefits, or valuations for divorce, dealing with complaints, and making disclosures at your request such as in relation to transfers to other plans;
- b) for general administration of the RSP, including: to record and pay benefits; for reviews we or our administrators conduct for statistical and reference purposes; and for other checks or administrative activities that may become necessary from time to time (like member tracing) should we happen to lose contact with you or to prevent fraud;
- c) for meeting our on-going regulatory and compliance obligations, and investigating or preventing crime; and
- d) to improve our and our administrators' processes and use of technology, including testing and upgrading of systems, developing solutions for access to historic data, and to learn about other processes we can use to improve the administration of the RSP.

Our use of your information as described above is permitted by applicable data protection law because it is:

- i. necessary for our legitimate interests in pursuing the purposes set out in (a) to (d) above, and (when we make the disclosures to NatWest for the audit and corporate transaction purposes referred to below) necessary for the legitimate interests of NatWest, such interests in each case not being overridden by your privacy interests (for more information, *see below*);
- ii. required to meet our legal or regulatory responsibilities, including when we make the disclosures to authorities, regulators or government bodies referred to below;
- iii. in some cases, necessary for the performance of a task carried out in the public interest and, when we use or disclose special categories of personal data, necessary for establishing, exercising or defending legal claims, or for carrying out obligations or

exercising rights in the field of employment law or social security (where authorised by law or agreement), or where the processing relates to personal data manifestly in the public domain; and

- iv. in limited circumstances, processed with your consent which we obtain from you from time to time, such as when you ask us to make disclosures or allocate benefits or to the extent that the RSP rules require you to provide information which we cannot otherwise process without your consent.

Where the personal data we collect from you is needed to meet our legal or regulatory obligations or to pay benefits to you or your nominated beneficiaries, if we cannot collect this personal data we may be unable to record or pay your or your beneficiaries' benefits. If you wish to transfer your pension to another plan, we will also be unable to effect that transfer if you do not provide us with a letter of authority.

### **Legitimate interest**

Where we rely on our legitimate interests as a ground for lawful data processing, we ensure that due regard and consideration has been given to your interests and fundamental rights and freedoms. In assessing our legitimate interests we have considered the following factors:

- the nature of our relationship;
- whether the processing is within your reasonable contemplation;
- whether the processing is beneficial to you;
- the kind of data processed;
- whether the processing is necessary and the impact of being unable to process such data and the impact our processing may have on you;
- whether there are other less intrusive ways to achieve our interests;
- the necessary safeguards to ensure that your rights and freedoms are protected in place whether there are less intrusive means to obtain the required information;
- If you would like more information on our legitimate interest processing activities, please contact us.

### **Disclosures of your information**

We may share your information with the following recipients in order to provide these services to you and so as to comply with certain legal obligations:

- our suppliers, including:
  - Legal and General Assurance Society Limited as our administrators to provide the fund's administration and member support services;
  - NatWest Group as employer – and also business functions of the bank such as the Day to Day Colleague Goal, RBS Investment Executive Limited, the Trustee Executive Support Team, and any other similar functions within the Bank that support the operational running of the RSP, provide member support services and for the purposes of Life Cover from time to time;
  - Deloitte LLP as our auditors;
  - Lane Clark and Peacock as our investment and defined contributions adviser;
  - Pinsent Masons LLP as our legal advisers
  - Equitable Life and Standard Life as our additional voluntary contributions provider; and
  - and other providers of services to us and you, such as financial advisors under a letter of authority with you (to provide you with financial advice), payroll providers (to record and pay benefits), providers of tools to help you gain a better understanding of your benefits, and accountancy, communication, IT and

hosting, printing, marketing, and tracing providers (and when we or our administrators share information with these recipients we take steps to ensure they meet our data security standards, so that your personal data remains secure).

- other members of the NatWest group, workplace pension schemes operated by NatWest Group and their professional advisers who support us in providing pension services to you such as RBS for audit purposes, in relation to corporate transactions initiated by RBS, and to allow you to flex your benefits including your pensions options (including via NatWest Benefits Hub);
- public authorities, regulators or government bodies, including when required by law or regulation, under a code of practice or conduct, or when these authorities or bodies require us to do so; and
- others persons from time to time when the disclosure is needed to exercise or protect legal rights, including those of the Trustee, our administrators, or other stakeholders, or in response to requests from individuals or their representatives who seek to protect their legal rights or such rights of others.
- Some of the entities listed above may also be data controllers under the data protection laws. However, in the first instance you should contact the Trustee using the contact details below if you have any queries about how they use your personal information.

### **Transfers of your information abroad**

The use and disclosure of your information will in certain circumstances involve transferring your information outside of the European Economic Area (“**EEA**”) to our IT service provider (via Legal and General) that operate in countries outside of the EEA, whose laws may not provide the same level of data protection and which do not benefit from an adequacy decision by the EU Commission. The country in which these recipients are located will vary from time to time, but currently include India.

The EEA is comprised of countries that are currently the EU plus Iceland, Liechtenstein and Norway.

When we transfer your information outside the EEA, these transfers will be governed by the Data Protection Laws. We may transfer your data outside the UK to a country which the UK government considers ensures an adequate level of protection of personal data. These “adequacy regulations” currently apply to a number of countries, including countries within the European Economic Area (EEA). If there are no adequacy regulations in place, we may only transfer your data if there are adequate safeguards and if you would have enforceable legal rights and effective legal remedies in respect of your data. If you would like to know more about i) the safeguards we put in place for transfers of personal information outside the EEA or ii) Legal and General’s data transfer practices and obtain copies of any relevant safeguarding measures, please *click here*.

### **Retention of your information**

The retention period we apply to personal information depends on the category of information and the purpose of its retention. In general, we will retain your information for 12 years after all entitlements to your benefits cease. For example, information will be retained for 12 years after the point at which the last benefit is payable to you or your beneficiaries and no liabilities remain within the RSP. In certain circumstances we will keep information for longer than this period. The criteria we apply to determine the periods for retaining your personal information include (1) requirements for the prudent administration of the RSP, (2) requirements of laws or statutes,

regulatory bodies or other government authorities, and (3) the demands of any pending, threatened, or potential litigation, audit, dispute, claim, complaint or other proceedings. In limited cases, we may contractually agree to a longer period of retention with you, in which case we will retain your personal information for that longer period.

## Your rights

You have various rights under data protection law in relation to your personal information and we respect those rights. These rights are detailed below.

- **Right of subject access:** The right to make a written request for details of personal information we hold about you and to request a copy of that personal information.
- **Right to rectification:** The right to have inaccurate information about you rectified.
- **Right to erasure ('right to be forgotten'):** The right to ask for personal information about you to be erased.
- **Right to restriction of processing:** In some cases, the right to request that your personal information is only used for restricted purposes.
- **Right to object:** The right to object to the use of personal information.
- **Right to data portability:** The right to ask for personal information you have made available to us to be transferred to you or a third party in machine-readable format.
- **Withdrawing consent:** Where we use your personal information with your consent, you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which such consent was given

These rights may not apply in all cases. If we are not able to comply with your request, we will explain why. In response to a request, we will ask you to verify your identity if we need to, and to provide information that helps us to understand your request better. If you would like more information about your rights or to exercise any of your rights, please *contact us*.

You can also lodge a complaint about our processing of your personal information with the office of the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)). The ICO can also be contacted by calling 0303 123 1113

## Updating your information

If you are a current employee of NatWest, please update your details in the bank's HR portal. If you are not a current employee of NatWest, please contact our administrators using the details at the bottom of this notice.

## Further information may be required to carry out requests

In some cases, it may be necessary to obtain additional information from you, such as in order to carry out your request for a transfer or allocation of benefits. We will notify you when your information is required for this purpose.

## Status of this privacy notice

This privacy notice was updated in October 2024. It is a notice explaining how your information is used, rather than a document that binds us or anyone else contractually. We reserve the right to amend it from time to time.

### **Contact information**

Vicki Roscoe, Scheme Secretary  
RBS Retirement Savings Trustee Limited  
NatWest Group  
1 Spinningfields Square  
Manchester  
M3 3AP  
United Kingdom  
Email: [vicki.roscoe@natwest.com](mailto:vicki.roscoe@natwest.com)  
Tel: +44 (0) 7870 834 241

### **Our Administrators**

Legal and General  
DC Pensions  
Legal & General  
PO Box 1560  
PETERBOROUGH  
PE1 9AP  
Email: [natwestgrouprsp@landg.com](mailto:natwestgrouprsp@landg.com)  
Tel: +44 (0) 345 072 0266

### **Life Cover (provided by Zurich)**

NatWest Group  
Floor 5  
1 Spinningfields Square  
Manchester  
M3 3AP  
United Kingdom  
Tel: +44 (0) 808 100 42 42

### **Scheme sponsor**

Floor 5  
1 Spinningfields Square  
Manchester  
M3 3AP  
United Kingdom

### **Trustee Executive Support Team**

Floor 5  
1 Spinningfields Square  
Manchester  
M3 3AP  
United Kingdom