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About us

NatWest Pension Trustee Limited of 1 Princes Street, London, EC2R 8PB (**Trustee**, we or us) is the trustee of the NatWest Group Pension Fund (formerly The Royal Bank of Scotland Group Pension Fund) (**Fund**). We are the controller of personal information we collect, or which is collected on our behalf or made available to us about members, their spouses, partners, dependants and/or beneficiaries, or any of their lawful representatives, relating to and for the purpose of administering the Fund.

We take your privacy seriously. We are committed to complying with the General Data Protection Regulation, the Data Protection Act 2018 and all other applicable data protection and privacy laws to ensure we properly protect your personal information (being information which identifies you or which is capable of doing so).

Please take the time to read this Privacy Notice as it explains how we collect, use and store your personal information, and the rights you have in relation to the protection of your personal information. For more information on your rights, please see [Your Privacy Rights](#) below.

The Trustee has appointed:

- together with National Westminster Bank plc (the **Bank**), Towers Watson Limited (trading as Willis Towers Watson) of Watson House, London Road, Reigate, United Kingdom, RH2 9PQ (the **Scheme Administrator**) to provide the Fund's administration and member support services;
- Aon Solutions UK Limited (formerly Aon Hewitt Limited) of Leadenhall Building, 122 Leadenhall Street, London, EC3V 4AN (the **Actuarial Adviser**) to provide actuarial services in relation to the Fund;

- David Eteen, an employee of the Actuarial Adviser to act as scheme actuary (the **Scheme Actuary**);
- Deloitte LLP of 2 New Street Square, London EC4A 3B2 to act as the auditors of the Fund (the **Auditors**);
- CMS Cameron McKenna Nabarro Olswang LLP of Cannon Place, 78 Cannon Street, London EC4N 6AF to provide legal services in relation to the Fund (the **Legal Adviser**);
- other service providers with whom your personal information may be shared for the purposes of administering your pension benefits and the Fund more generally, valuing the Fund to assess and maintain its ability to pay out required pension benefits, and complying with its legal obligations and maintaining good governance practices (see further [below](#)).

While performing certain functions, the Actuarial Adviser, Scheme Actuary, Legal Adviser and certain other service providers may each act as a controller of your personal information. Where this is the case, the relevant third party's privacy notice will set out the ways in which they may use your personal information (see further [below](#)). Please see the information in the "Scheme Actuaries" section below for further details of the processing of your personal information by the Scheme Actuary.

What personal information do we collect and how?

When you became eligible to join the Fund, you or the Bank's HR team may have provided us with your:

- first, middle and last names,
- contact details,
- date of birth,
- gender,
- national insurance number,
- marital status,
- staff number,
- salary details,
- basic employment details (such as employment start/end dates, working hours, etc.),
- contribution amounts, and
- financial information (such as your bank account, tax details, information about your investments or other pensions).

During your membership of the Fund, you may also have provided us with:

- details of your family, dependants and desired beneficiaries,
- changes to your personal information (such as to your address, email address, marital status, etc.) if applicable,
- birth/marriage certificates and other identity documents that you provide us with (such as copies of your passport or driving licence),
- if you were married or in a civil partnership, divorce, dissolution, separation or annulment details,
- transfer details (in and/or out),

- investment choices,
- details of other pension schemes you may have benefits with, and
- in certain circumstances, information about your health, lifestyle and social circumstances (see further information [below](#)).

We also collect additional personal information about you through our dealings with you. For example, this will include information you provide when you:

- make any applications, claims or requests,
- correspond with us or any of our appointed representatives, including by email, letter and during telephone calls,
- access our website (including when you make use of the automated ‘password reset’ function which will require you to provide information we need to verify your identity),
- make a complaint, or
- undergo electronic and identity verification checks prior to the payment of any benefits.

In addition, we also obtain some information about you, your dependants and your nominated beneficiaries from various third parties including:

- government bodies such as HM Revenue & Customs (HMRC), the General Register Office, the Electoral Roll, HM Land Registry, the National Insurance Contribution Office (**NICO**) and the Department for Work and Pensions (**DWP**) may send us information about you, for example, about your contracted-out entitlement (**HMRC** or **NICO**) or your State Pension benefits (**DWP**),
- your independent financial adviser (if appointed),
- regulatory bodies,
- the Telephone Directory
- bankruptcy and insolvency registers,
- company registers as available from Companies House,
- medical advisers (including Nuffield Health of Epsom Gateway, Ashley Avenue, Epsom, Surrey, KT18 5AL (**Nuffield Health**) who the Trustee has appointed to provide medical services relating to ill-health retirement applications), and
- tracing organisations (which we use to ensure that the information we hold about you and/or your dependants remains accurate).

If you are not a member of the Fund and you contact us to make a claim of entitlement as a beneficiary or for any other purpose, we may collect some of the information detailed above about you to verify your identity and any connections with or potential entitlements in relation to the Fund.

Lawful representatives

If you are the lawful representative or legal guardian of a member, or an actual or potential beneficiary we will need to collect your contact details in order to enable us to communicate with you in relation to the person you represent.

Using our website

Our website, ePA, is provided by the Scheme Administrator. The Scheme Administrator will be the controller of any technical information collected through your use of this website which may include personal information relating to you, including your log-in details and any cookies stored on your device for the purpose of accessing the website.

The Scheme Administrator will process your personal information which is collected by using cookies or similar technologies in accordance with its Site Cookie Notice and Site Privacy Notice. You can access the Scheme Administrator's notices at any time by following the links at the bottom of the ePA log-in page.

What will we use your personal information for?

We collect and process information about you for the purposes of complying with our legal duties to administer the Fund, and for other legitimate purposes relating to the operation of the Fund. We will only use your personal information for the purposes of:

- calculating and administering pension benefits and payments,
- updating, consolidating and improving the accuracy of our records,
- crime detection, prevention and prosecution,
- checking your identity to comply with our legal, regulatory and security requirements,
- providing you with the information that you request from us,
- investigating any complaint you may make,
- providing evidence in any dispute or anticipated dispute between you and us,
- notifying you about changes to your pension,
- providing you with access to our website,
- modelling, profiling, statistical and trend analysis, with the aim of developing and improving the services provided in relation to your pension, assessing the ability of the Fund to pay out its benefit obligations and to monitor its liquidity based on future predictions of longevity, and the assumptions and criteria we apply for the purposes of managing the funding and investment strategy of the Fund, and
- sharing it with third parties for the purposes outlined in the section below.

We will not use or share your personal information with third parties for the purposes of marketing.

Who do we share your personal information with?

We may share your personal information with third parties who help us provide you with your pension. For example, we may provide your personal information to:

- the Scheme Administrator and its approved sub-contractors - for benefit administration purposes,
- our Scheme Actuary and Actuarial Advisor - for complex benefit calculations, valuations of our assets and liabilities, and regulatory reporting as required by law (further information concerning the Scheme Actuary's use of your personal information is available in its privacy notice, which is available online at <http://www.aon.com/unitedkingdom/products-and-services/human-capital-consulting/aon-hewitt-actuarial-services-privacy-statement.jsp>),

- our Auditors - to comply with legal requirements and ensure the Fund and your benefits are being administered properly. The Auditor requires access to your personal information in limited circumstances in order to verify information provided by the Trustee about payments it has made and to review other decisions made by the Trustee in the scope of its appointment as the auditors to the Fund. The Auditors are under professional obligations to keep your information confidential. If you would like to know more about the Auditors, please see their website at <https://www2.deloitte.com/uk/en/services/audit>,
- our Legal Adviser - for advice and interpretation of law and regulations in connection with your pension. Our Legal Adviser will receive your personal information where necessary in order to provide legal advice to the Trustee on legal or regulatory requirements the Trustee must comply with, any disputes that occur in your relationship with the Trustee, or elsewhere where necessary in order to provide the Trustee with advice on its legal obligations and liabilities. The Legal Adviser is under professional obligations to keep any information received from the Trustee, including your personal information, confidential. For further information on the Legal Adviser, see the Legal Adviser's website at <https://cms.law/en/GBR/>,
- companies we engage to conduct medical assessments, including Nuffield Health. Nuffield Health will receive your personal information when you make an application for ill-health early retirement and the Trustee needs medical information in order to make a determination as to whether you qualify for ill-health early retirement in accordance with the rules of the Fund. This information can include your medical records, the results of any medical assessment you undertake with Nuffield Health and any other information you provide to Nuffield Health in the course of your ill-health early retirement application. Medical practitioners employed by Nuffield Health are under professional obligations of confidentiality. For further information on Nuffield Health, see Nuffield Health's website at www.nuffieldhealth.com,
- companies we engage to conduct longevity modelling and analysis, including Club Vita LLP of One London Wall, London EC2Y 5EA who provide longevity (life expectancy) analytics and related information for the purposes of helping the Trustee manage the Fund's liabilities. Club Vita gathers together data relevant to measuring longevity from the membership of over 200 pension schemes, including the Fund, in order to allow each participating scheme to obtain greater insights than would be possible using only the data each scheme holds individually. Club Vita will also use the insights from this pooled data to generate further insights which will be made available to third parties and/or the pensions industry as a whole, but any insights made available to third parties will not contain your personal information. If you would like to know more, information on Club Vita's service is available on their website at <https://www.clubvita.co.uk/>,
- insurers and reinsurers for the purposes of obtaining insurance cover,
- companies we engage to provide IT system services,
- government bodies, law enforcement agencies and crime prevention organisations including HMRC, The Pensions Regulator, The Charities Trust, The Office for National Statistics and the police - for the purposes of crime prevention and detection, and compliance with regulatory requirements,
- credit reference agencies, consumer reporting and fraud prevention agencies - to check your identity and credit history when we process an application or claim to entitlement,
- tracing organisations and LexisNexis Risk Solutions UK Limited – to check that the information we hold about you and/or your dependants remains accurate,

- companies that print and distribute mailings,
- at your request, with your independent financial advisor - so that they can advise and provide their services to you. This includes transfer to Liverpool Victoria Financial Advice Services Limited (LV), if you authorise us to transfer your personal data to LV in order to receive financial advice,
- your dependants, beneficiaries or people entitled to benefit under your membership of the Fund, and
- your current, past or prospective employers.

The Bank holds personal data to comply with its legal obligations as the sponsoring employer of the Fund. It has a legitimate interest in the Fund being run in a cost-effective way. We share your personal information with the Bank and companies within the Bank's group:

- to help us administer your pension,
- for employment administration purposes,
- for payroll purposes,
- to confirm or correct what we know about you,
- to help us prevent fraud, money laundering, terrorism and other crimes by verifying what we know about you,
- to comply with the law, for example, to enable sharing your personal information with the police or fraud agencies where necessary to prevent fraud,
- in connection with audits of their business,
- to enable you to receive information about services available to you, and
- to fulfil other business purposes such as product development and website administration.

Your personal data will also be released to other external parties if authorised by you, or as required or permitted by law, or to comply with a judicial proceeding, court order, request from the Pensions Regulator, Pensions Ombudsman or any other regulator or any other legal process served on or involving the Trustees.

When we share your personal data with third parties who perform business services for us, we require them to take appropriate steps to protect your personal information, and only to use the personal information for the purpose of performing those specific services. If you want to know more about our data sharing arrangements, or the data protection practices of the Scheme Actuary, Actuarial Advisor or Legal Advisors, [please let us know](#).

Ensuring that the processing we carry out is lawful

We take appropriate measures to ensure that all processing of your personal information by us, or by our service providers, is lawful. The lawful basis for the processing of your personal information (which is not a special category of personal data) will depend on the purposes for which we process your information.

Sometimes we also need to process your personal information to comply with our legal obligations including in relation to performing anti-money laundering, terrorism prevention and sanctions screening checks, complaints and investigations or litigation.

We have a legitimate interest to process your personal information for:

- the purposes of administering your pension benefits and any payments,

- communications purposes,
- modelling, profiling, statistical and trend analysis to develop and improve the services we provide and the assumptions and criteria we apply for the purposes of managing the funding and investment strategy of the Fund,
- obtaining insurance cover,
- ongoing management of our relationship with you and to maintain contact with you (e.g. providing annual updates), and
- our internal business purposes which include business and disaster recovery, document retention/storage and IT service continuity (e.g. back-ups and helpdesk assistance) to ensure the quality of the services we provide to you.

Some of the information we collect or receive is classed as a special category of personal data. These types of personal information are more sensitive, for example, concerning your health.

Sometimes the Trustee may need to process certain special categories of personal data in order to administer your pension or in connection with the Fund's Internal Dispute Resolution Procedure. We will in most circumstances process this information as necessary for the establishment, exercise or defence of legal claims to benefits or in the performance of our legal obligations in connection with employment, social security, or social protection (as allowed by legislation), or we have obtained your consent (which we will seek at the time we collect the data). Where we are relying on your explicit consent to process your special categories data, you can withdraw it at any time. We may also collect information relating to your health where necessary for health and social care purposes (including in relation to occupational medicine).

For further information on how the Trustee ensures that its use of your personal information is lawful, [please let us know](#).

Will we send your personal information outside the UK?

In order for us to administer your pension benefits, your personal information (including special categories of personal information) may be transferred outside of the UK and the European Economic Area (EEA) to our IT providers and other suppliers in connection with their provision of services to us. The EEA comprises those countries that are in the European Union (EU) and some other countries that are considered to have adequate laws to ensure personal information is protected. The Scheme Administrator also carries out some processing of your personal information using its affiliates in India and the Philippines.

When transferring your personal information outside of the UK or the EEA, we will (and will ensure that service providers acting on our behalf agree to) protect it from improper use or disclosure and ensure that appropriate levels of protection are in place. If you would like further information on the protection we have in place with our suppliers outside the UK or the EEA, [please let us know](#).

How will we store your personal information?

Your personal information will normally be stored electronically on our administrator's database, workflow and document management systems. Some of your personal information is stored in paper format whilst work is carried out on it, but once complete it will be scanned and stored electronically with any paper copies being destroyed or original documents being returned to you.

How long will we store your personal information for?

We store your information until such time as we will no longer need it. In general, this means that paper copies will be stored for a maximum of 6 months after being scanned and will then be securely destroyed (with the exception of original legal documents such as birth/marriage certificates, which will be returned to you).

The Trustee needs to retain accurate records of who has benefit entitlements under the Fund. Pension benefits are built up over such a long period of time, people often forget where they do and don't have benefits, and by keeping this information, we will be able to assist you should you find this happens to you. Except as provided above, our policy is to retain relevant information about you throughout your membership of the Fund and for a further period of six years after your membership of the Fund ends (i.e. once all benefits have been paid to you and to any eligible beneficiaries).

However, information will be held for longer where: (i) we consider it appropriate in order to ensure the Fund pays the correct benefits and to deal with any queries relating to your benefits which may arise after that time, or (ii) required by law.

Our Scheme Administrator's current policy is to hold on to your personal data for up to 10 years after the termination of their administration services contract with us. This is to protect themselves against any subsequent legal claims.

How will we keep your personal information safe?

We take the security of your personal information very seriously. We have (and we require our relevant service providers to have) technical, administrative, and physical security measures in place to protect it:

- Bank employees are subject to credit, employment and criminal record history checks which are completed before their employment starts,
- completion of data protection and IT security training is mandatory for new joiners and must be completed annually by existing employees, and our individual trustees,
- physical access to areas where your personal information is stored is controlled and regularly reviewed,
- electronic access to all systems containing your personal information is controlled and regularly reviewed,
- we have secure IT systems with passwords and encryption,
- we securely destroy personal information that is no longer required,
- use and disclosure of your personal information is strictly controlled to prevent inappropriate use or disclosure,
- we encrypt your personal information to prevent unauthorised access when transferring it,
- we carry out periodic reviews of our security policies and procedures, and
- our suppliers are required, where relevant, to employ measures equivalent to these.

Although we work hard to protect your personal information, unfortunately, no security measure is impenetrable.

What rights do you have?

We have set out below a summary of your rights in relation to your personal information. If you would like more details about your rights, please see the separate [Your Privacy Rights](#) section of this notice:

Your rights summarised	What does this mean?
1. The right to be informed	You have the right to be provided with a clear, transparent and easily understandable explanation of how we use your personal information and your rights in relation to it. This is why we're providing you with the information in this Privacy Notice.
2. The right of access	<p>You have the right to obtain access to your personal information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice).</p> <p>This is so you're aware of the personal information that we hold about you, and can check that we're using it in accordance with data protection law.</p> <p>For more details, see Accessing your information.</p>
3. The right to rectification	<p>You're entitled to have your personal information corrected if it's inaccurate or incomplete.</p> <p>For more details, see Correcting your information.</p>
4. The right to erasure	<p>This is also known as 'the right to be forgotten' and enables you to request the deletion or removal of your personal information where there's no compelling reason for us to keep it. This is not an absolute right to erasure. We may have a right or obligation to retain information in some circumstances, such as if we are under a legal obligation to keep it, or have another valid legal reason to retain it.</p> <p>For more details, see Erasing your information.</p>
5. The right to restrict processing	<p>In certain situations you have the right to 'block' or suppress further use of your information. When processing is restricted, we can still store the information that we have, but may not use it further. We keep lists of people who have restricted processing of their personal information to make sure the restriction is respected in future.</p> <p>For more details, see Restricting processing of your information.</p>
6. The right to data portability	<p>You have rights to obtain a copy of some of the personal information that we hold on you and reuse or share it for your own purposes.</p> <p>For more details, see Taking your personal data with you.</p>

7. The right to object	<p>You have the right to object to certain types of processing, including processing we perform on the basis of our legitimate interests.</p> <p>For more details, see Objecting to processing.</p>
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How to get more help

If you want help to understand our Privacy Notice, or would like to exercise any of your rights, please contact the Scheme Administrator, whose contact details are as follows:

Address: Willis Towers Watson, the NatWest Group Pension Fund, PO Box 545, Redhill, Surrey RH1 1YX

E-mail: gfpensions@willistowerswatson.com

If you are unhappy about any aspect of the way we collect, share or use your personal information, please let us know using the contact details above.

You also have a right to complain to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 or via its website at www.ico.org.uk/global/contact-us/.

How will you know if we amend this Privacy Notice?

We may need to make changes to this Privacy Notice at any time. If we make any material change to how we collect your personal information, or how we use or share it, we will update this Privacy Notice and inform you of these changes by posting prominent notices of the key changes on our website, ePA.

YOUR PRIVACY RIGHTS

This section explains your rights in relation to your personal information in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

We will respond to your requests in respect of your personal information free of charge (except in the following circumstances, where we may charge a reasonable fee to cover our administrative costs or may be entitled to refuse to respond:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information).

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described in this section, [please contact us](#).

Further information and advice about your rights can be obtained from the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 or on its website at www.ico.org.uk/global/contact-us/.

How can we help?

[Accessing your information](#)

[Correcting your information](#)

[Erasing your information](#)

[Restricting processing of your information](#)

[Taking your personal data with you](#)

[Objecting to processing](#)

[Automated decision making and profiling](#)

Accessing your information

What can you request access to?

You have the right to:

- receive confirmation from us that your personal information is being processed;
- access your personal information; and
- certain other details in relation to how we use your personal information (which is generally included in this Privacy Notice).

You can request copies of paper and electronic records (including telephone calls, where applicable) about you that we hold, share or use. To deal with your request, we can ask for proof of your identity and enough personal information about you to enable us to locate the personal information you have requested.

When will access not be provided?

We can only provide you with *your personal information*, not personal information about another person. Also, where access would negatively affect another person's rights, we're not required to provide this. Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

When requesting access to your personal information, to help us respond to your request quickly, please clearly set out in your request the personal information that you would like. If this is not clear, we may need to ask for further information from you by way of clarification.

Correcting your information

You have the right to require us to correct inaccurate personal information that we hold about you.

If you tell us that the personal information we hold on you is incorrect, we will review it and, if we agree with you, we will correct our records. If we do not agree with you, we will let you know. If you believe the records we hold on you are still incorrect, you can let us know in writing, and we will include your statement when we give your personal information to anyone outside the Fund.

If you believe that we hold incomplete personal information about you, you may also have the right to have the information completed, including by providing a supplementary statement. Whether or not this right applies will depend on the purposes for which your personal information is being processed.

We need to notify any third parties with whom we have shared your personal information that you have made a correction request (see [Who do we share your personal information with?](#)). We will take reasonable steps to do this, but if it is not possible or costly we may not be able to do so.

How You Can See and Correct Your Information

Generally, if you ask us in writing, we will let you see the personal information that we hold about you, and/or take steps to correct any inaccurate information.

Due to legal privilege, we may not be able to show you anything that we learned in connection with a claim or legal proceeding.

Erasing your information

When can you request deletion of your personal information?

Subject to the section below [When can we refuse erasure requests?](#), you have a right to have your personal information erased, and to prevent further processing of your personal information, where:

- the personal information is no longer necessary for the purpose it was originally collected/processed,
- you withdraw your consent (where consent was previously provided and required for us to process the information),
- you object to the processing, as long as our legitimate interests in processing your personal information don't take priority over your objection,
- we've been processing your personal information unlawfully, or
- your personal information has to be erased in order to comply with a legal obligation.

When can we refuse erasure requests?

The right to erasure does not apply where your information is processed for certain specified reasons, including to establish, exercise or defend legal claims.

More importantly, if we have to erase your data we will not be able to administer your pension benefits or payments, so please carefully consider any request to erase your personal information.

Do we have to tell other recipients of your personal data about your erasure request?

If you request that your personal information is deleted, and we have provided that information to any third parties (see **Who do we share your personal information with?**), we need to inform them about your erasure request, so they can also erase the personal information in question. We will take reasonable steps to do this, but it may not always be possible.

Third parties can also refuse erasure requests if one of the exemptions above applies – see [When can we refuse erasure requests?](#)

Restricting processing of your information

When is restriction available?

You have the right to restrict the processing of your personal information:

- where you consider the information we hold to be inaccurate, in which case we have to restrict any processing while we verify the accuracy of your personal information,
- when the processing we are carrying out is unlawful and you request us to restrict processing, rather than erasing your personal information,
- if we no longer need the personal information, but you need it to establish, exercise or defend a legal claim, or
- while we are considering our legitimate interests for processing your personal information to which you have objected in the circumstances detailed in paragraph (a) of [Objecting to processing](#).

What happens while processing is restricted?

We can store your personal information, but we cannot carry out any further processing of it, such as payment of pensions or tasks associated with the transfer of benefits, without your consent (unless processing is required in connection with legal claims, to protect another person's rights or for important public interest).

Do we have to tell other recipients of your personal data about the restriction?

Where we have disclosed your relevant personal information to third parties, we need to inform them about the restriction on the processing of your information, so that they do not continue to process it.

We'll take reasonable steps to do this, but it may not always be possible.

We will also let you know if we decide to lift a restriction on processing.

Taking your personal data with you

When does the right to data portability apply?

The right to data portability only applies:

- to personal data you've provided to us (i.e. not any other information),
- where we are processing your personal information because you have provided your consent for us to do so, or under a contract with you; and
- when processing is carried out by automated means.

We do not carry out any automated processing or processing based on consent or in accordance with a contract, and therefore this right should not arise.

Objecting to processing

You have the right to object at any time to processing of personal information concerning you which is carried out because of our legitimate interests.

If we can show compelling legitimate grounds for processing your personal information which override your interests, rights and freedoms, or we need your personal information to establish, exercise or defend legal claims, we can continue to process it.

Processing of your personal information will be restricted while we make this assessment (see [Restricting Processing of your Information](#)). Otherwise, we must stop using the relevant personal information.

Automated decision making and profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which has legal consequences for you or which significantly affects you.

We do not carry out any automated processing or profiling which has legal consequences for you or significantly affects you, and therefore this right should not arise.