

# Privacy Notice



for Mortgage  
Brokers/Intermediaries



**NatWest**  
International



“**We**”, “**us**” and “**our**” for the purposes of this notice means the \*Royal Bank of Scotland International Limited (RBS International) and the data controller for the purposes of data protection law.

We are a member of NatWest Group plc (NatWest Group). More information about the NatWest group can be found at [www.rbs.com](http://www.rbs.com) by clicking on ‘About Us’

### **About this privacy notice**

This privacy notice applies to your appointment as an intermediary on our behalf and sets out the basis on which any personal information about you will be processed by us. This privacy notice may be updated from time to time and we will communicate any changes to you.

### **Personal information that we collect about you**

We will collect and process various types of personal information about you. This includes information that you provide to us (by communicating with us, whether face-to-face, by phone, e-mail or otherwise); information we collect or generate about you (such as call recordings or information relating to your use of our registration platform); information that we obtain from other sources (for example publicly available sources, such as the press, the electoral register, company registers and online search engines), or information provided by third parties (such as credit reference, fraud prevention or government agencies).

This information may include:

- personal details such as name, address, date of birth; information obtained during screening and due diligence checks;
- communications to and from us, and information stored or processed on bank IT systems, databases, and document management systems; and
- where permitted by law, information relating to criminal convictions or offences and alleged offences for specific and limited activities and purposes, such as to perform checks to prevent and detect crime, to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and for international sanctions.

### **Uses of your personal information**

Your personal information may be stored and processed in the following ways and for the following purposes:

- to check your identity and process and manage your registration as an intermediary including assessing your suitability
- to carry out adverse media checks, screening against external databases and sanctions lists and establishing connections to politically exposed persons. This may include information relating to criminal offences obtained from pre-registration screening;
- for the day to day management of your role as an intermediary (such as processing your registration, interactions with our regulators; statutory and regulatory filings within all jurisdictions where we operate; providing you with advice and support; for inclusion on internal and external websites; and communicating with you)

\* RBS International also trades as NatWest International, Isle of Man Bank and Coutts Crown Dependencies

- to monitor and record communications and telephone conversations between us and you. We will only undertake monitoring for preventing and detecting possible criminal activity; to ensure compliance with the bank's internal policies; to comply with local laws and regulations and to check for viruses or other threats to our IT systems. We will comply with all local laws, regulations and internal policies when doing so. Those recordings may be used by us in evidence in the event of a dispute with you or our customer with whom you are associated; and
- to provide you with the fees to which you are entitled.

We are entitled to use your personal information in these ways because:

- it is necessary for the performance of our contract with you (for example for the provision of your services and for remuneration);
- we have legal and regulatory obligations to prevent and detect crime, money laundering, fraud, terrorist financing, bribery and corruption, and to comply with international sanctions;
- the use of your personal information is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), in the course of running our business, or to establish, exercise and defend our legal rights; or
- where we process information relating to criminal convictions or offences, we will only do so to comply with relevant laws and regulations, to prevent or detect unlawful acts, to exercise or defend our legal rights or in connection with legal proceedings, or where we have obtained your explicit consent.

### **Disclosure of your information to third parties**

We may need to share your personal information with colleagues in the bank (including our suppliers and other NatWest Group companies). We will take steps to ensure that the personal information is accessed only by employees that have a need to do so for the purposes described in this notice.

We may also share your personal information outside of the NatWest Group:

- with fraud prevention agencies for the purposes of confirming your identity and to comply with regulatory obligations to prevent and detect crime, money laundering and fraud;
- to third party suppliers, agents or vendors for the purposes of providing services to us, including third parties carrying out due diligence and screening checks on our behalf. These third parties will be subject to confidentiality requirements and they will only use your personal information as described in this privacy notice;
- if we sell any of our business or assets or if we are acquired by a third party, in which case we may disclose your personal information to the prospective buyer for due diligence purposes;
- courts, regulators, government bodies and similar organisations as required by law (such as the Financial Conduct Authority, Prudential Regulatory Authority, or local equivalents);
- corporate auditors and legal or other advisors; and
- to the extent required by law, for example if we are under a duty to disclose your personal information in order to comply with any legal obligation, or to establish, exercise or defend our legal rights.

## **Transfers of personal information overseas**

We may transfer your information to organisations in other countries (including to other NatWest 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.

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 or our own Data Protection Authority) to ensure your information is adequately

## **Retention of personal information**

Your information will be retained in line with our internal records management policies and retention schedules. How long we hold your personal information for will vary. The retention period will be determined by various criteria including the type of record in which your information is included; the purpose for which we are using it (we will need to keep the information for as long as is necessary for that purpose); and legal obligations (laws or regulation may set a minimum period for which we have to keep your personal information).

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.

## **Your rights**

You have a number of legal rights in relation to the personal information that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal information and access to the personal information which we hold about you;
- where we rely on your consent, the right to withdraw your consent to our processing of your personal information at any time. Please note, however, that we may still be entitled to process your personal information if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal information in a structured, commonly used and machine-readable format and/or request that we transmit this information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us;
- the right to request that we rectify your personal information if it is inaccurate or incomplete;

- the right to request that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled, and in some cases obliged, to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to continue processing your personal information and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below. It is important to understand that in some cases, exercising your rights may mean that we are no longer able to use your services.

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 relevant data protection authority. For more information please visit:

- Jersey: [www.dataci.je](http://www.dataci.je)
- Guernsey: [www.dataci.gg](http://www.dataci.gg)
- Isle of Man: [www.inforights.im](http://www.inforights.im)
- Gibraltar: [www.gra.gi](http://www.gra.gi)

## **Contacting us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, you can:

- Visit any of our branches and speak to one of our staff or your usual Relationship point of contact.
- Contact our Data Protection Officer at [dpo@rbsint.com](mailto:dpo@rbsint.com) Please note that additional personal information should not be included in this message for security reasons.



The Royal Bank of Scotland International Limited trading as NatWest International (NatWest International). Registered Office: Royal Bank House, 71 Bath Street, St. Helier, Jersey, JE4 8PJ. Tel. 01534 282850. Regulated by the Jersey Financial Services Commission.

Guernsey business address: Royal Bank Place, 1 Glatigny Esplanade, St. Peter Port, Guernsey, GY1 4BQ. Tel. 01481 703860. Regulated by the Guernsey Financial Services Commission and licensed under the Banking Supervision (Bailiwick of Guernsey) Law, 1994, as amended, the Insurance Managers and Insurance Intermediaries (Bailiwick of Guernsey) Law, 2002, and the Protection of Investors (Bailiwick of Guernsey) Law, 1987, as amended.

Isle of Man business address: 2 Athol Street, Douglas, Isle of Man, IM99 1AN. Tel. 01624 637190. Licensed by the Isle of Man Financial Services Authority in respect of Deposit Taking, Investment Business and registered as a General Insurance Intermediary.

NatWest International is the registered business name of The Royal Bank of Scotland International Limited under the Business Names Registration Act. Gibraltar business address: NatWest International House, 57 Line Wall Road, Gibraltar. Tel. 200 77737 or 200 73200. Regulated and authorised by the Financial Services Commission, Gibraltar to undertake Banking and Investment Business from 55 and 57 Line Wall Road, Gibraltar.