

## **1 Who we are**

1.1 This privacy notice (the “Privacy Notice”) applies to all information we collect, use and process about you as a user of NatWest Accelerator (“the App”) provided by National Westminster Bank plc (NatWest).

1.2 NatWest is a data controller in respect of personal information processed in connection with the Accelerator App. In this notice, references to “we”, “us” or “our” are references to NatWest.

1.3 Our principal address is 250 Bishopsgate, London EC2M 4AA and our contact details can be located at NatWest.com.

1.4 We are a member of NatWest Group plc. More information about the NatWest group and its brands can be found at NatWestGroup.com.

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 the Accelerator App. “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).

## **2 The Service**

NatWest Accelerator is our 24/7 digital platform provides users with seamless access to a wealth of Accelerator resources, including expert support, practical tools, and valuable insights. Allowing users to connect with a thriving community of like-minded business owners and learn from each other’s experience, insights, and best practices.

## **3 The information we process**

3.1 We collect and process various categories of personal and confidential information at the start of, and for the duration of, your relationship with us and beyond (subject to appropriate retention periods). We will limit the collection and processing to information necessary to achieve one or more legitimate purposes as identified in this notice. Personal and confidential information may include:

- a) basic personal information, including name/username, address and contact details. We ask for a username so that if you make any posts or comments that these are attributable to you. Other users will also be able to search for you by name, and it will be shown on your public profile page;
- b) email address – we use this to send you a welcome email, and any service related communications such as resetting your password or verifying your email address. We will not send you any marketing or third-party messages unless you have explicitly provided your consent for us to do so;
- c) information about your lifestyle, social circumstances and preferences;
- d) password – we store this in a secure one-way encrypted system. If you forget your password, you may request that it be reset, and we will send an email to you with instructions on how to do so;

e) posts and comments within the App. Any posts and comments you make are in the public domain and may be viewed by non-registered users in the App, on public web pages, and by other users of the App via periodic emails showing recent App activity.

f) visual images and personal appearance (such as profile photos). This is optional, but if you add a profile picture this will be shown next to any posts and comments you make, as well as on your public profile page;

g) online profile and social media information and activity based on your interaction with the App, including for example, your login information, Internet Protocol (IP) address, smart device information, location coordinates, App security authentication, site visits, one-to-one and group messages (please note the content of your messages is not visible to us).

3.2 We may also process certain special categories of information for specific and limited purposes. We will only process special categories of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so (and then only for the particular purposes and activities for which the information is provided as set out in Schedule A). This may include information revealing:

a) racial or ethnic origin

b) information concerning health

3.3 We're committed to supporting founders from all backgrounds. To do this, we'd like to know more about you. We will use special category data you choose to provide for the purposes of our obligations and goals to; report aggregated demographic data, take steps to identify and take proportionate action where there are underrepresented groups.

3.4 Where we rely on your consent to process your special category data, you can withdraw your consent at any time by modifying your profile information in your account settings to remove any personal data you no longer wish to share. You must save any changes you make to your profile to ensure all updates are applied.

#### **4 How we obtain information**

4.1 Your information is made up of all the personal information we collect and hold about you/your business. It includes:

a) information you give to us;

b) information that we learn about you through our relationship with you and the way you use NatWest Accelerator;

c) information that we gather, where we have your consent, through cookies or similar tracking tools when you use the NatWest Accelerator platform.

#### **5 Your rights**

5.1 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 03457 888 444. Overseas number: +44 3457 888 444. Relay UK 18001 03457 888 444. Alternatively, please use our online complaints process which can be found here: <https://www.natwest.com/support-centre/how-to-complain.html>

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 account and/or provide certain products and services to you.

**Table A – Your Rights**

<b>Rights</b>	<b>Description</b>
<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, or 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="https://www.natwest.com/gdpr-triage-page.html">https://www.natwest.com/gdpr-triage-page.html</a></p> <p>Or please contact us at <b>03457 888 444</b>. Overseas number: <b>+44 3457 888 444</b>. Relay UK <b>18001 03457 888 444</b>.</p>
<b>Rectification</b> – You have a right to rectification of inaccurate personal information and to update incomplete personal information.	<p>If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.</p> <p>Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<b>Erasure</b> – You have a right to request that we delete your personal information.	<p>You may request that we delete your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>• we no longer need to process your information for the purposes for which it was provided;</li> <li>• we have requested your permission to process your personal information where required for a particular purpose 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 that we delete your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<b>Restriction</b> – You have a right to request that we restrict the processing of your personal information.	<p>You may request that we restrict processing your personal information if you believe that:</p> <ul style="list-style-type: none"> <li>• any of the information that we hold about you is inaccurate;</li> <li>• we no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims; or</li> <li>• we are not using your information in a lawful manner.</li> </ul> <p>Please note that if you request that we restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<b>Portability</b> – You have a right to data portability.	Where we have requested your permission to process your personal information or you have provided us with information

Rights	Description
	<p>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 are not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.</p> <p>If you would like to request the personal information you provided to us in a portable format, please visit our website at: <a href="https://www.natwest.com/gdpr-triage-page.html">https://www.natwest.com/gdpr-triage-page.html</a></p> <p>Or please contact us at <b>03457 888 444</b>. Overseas number: <b>+44 3457 888 444</b>. Relay UK <b>18001 03457 888 444</b>.</p>
<p><b>Objection</b> – You have a right to object to the processing of your personal information.</p>	<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. Please note that if you object to us processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.</p>
<p><b>Marketing</b> – You have a right to object to direct marketing.</p>	<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>
<p><b>Automated decisioning</b> – You have a right to object to automated decision-making or profiling.</p>	<p>You have rights in relation to automated-decision making or profiling, including a right to appeal if your application is refused. You can appeal via our normal complaints process outlined below.</p>
<p><b>Withdraw consent</b> – You have a right to withdraw your consent.</p>	<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>
<p><b>Lodge complaints</b> – You have a right to lodge a complaint.</p>	<p>If you wish to raise a complaint on how we have handled your personal information, please use our online complaints process which can be found here: <a href="https://www.natwest.com/support-centre/how-to-complain.html">https://www.natwest.com/support-centre/how-to-complain.html</a>  <a href="https://www.ulsterbank.co.uk/help-and-support/how-to-make-a-complaint.html">https://www.ulsterbank.co.uk/help-and-support/how-to-make-a-complaint.html</a></p> <p>Alternatively, you can contact our Data Protection Officer at</p>

Rights	Description
	<p><b><u>NatWestDataProtection@natwest.com</u></b> 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 <b><u>ico.org.uk</u></b></p>

## 6 Changes to the way we use your information

From time to time, we may change the way we use your information. When we do, we will communicate any changes to you and publish the updated Privacy Notice on The Accelerator website and via the Accelerator App. 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.

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 account.

## 7 How we use and share your information with other NatWest group companies

We will use and share your information with other NatWest group companies to lawfully carry out our business activities as a group of companies (for example, to manage our risk, to support our decision-making processes, to provide you with products or services, for marketing services, for internal reporting, or where those companies provide services to us). We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in a table in Schedule A – Purposes of Processing.

## 8 Sharing with other third parties

8.1 We will not share your information with anyone outside NatWest Group except:

- a) where we have your permission;
- b) where required, whether directly or indirectly, to facilitate your use of the Accelerator App, which could include in relation to your welfare or accessibility requirements;
- c) with law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory or trade bodies around the world;
- d) with third parties in relation to fraud or financial crime or criminal activities; or in the event of suspected fraud or financial crime or criminal activities; or the monitoring, prevention and investigation of the same;
- e) with third parties providing services to us, such as where advice or services are required or requested in connection with the bank's legal, regulatory or contractual rights or obligations relating to products or services provided to you;
- f) in anonymised form as part of statistics or other aggregated data relating to your usage of and activity within the Accelerator App; or

g) 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.

8.2 We will not share your information with third parties for their own marketing purposes without your permission.

## **9 Transferring information overseas**

9.1 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.

9.2 In the event that we transfer information to countries outside of the UK and 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 UK 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 UK) to ensure your information is adequately protected. If you wish to obtain a copy of the relevant data protection clauses, please contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

## **10 Marketing information**

Where we have appropriate marketing permissions, we will send you relevant marketing information (including details of other products or services provided by us, other NatWest Group companies or other selected third parties which we believe may be of interest to you), by mail, phone, email, text, mobile app, online and other forms of electronic communication. We will not share your information with non-NatWest group third parties for their own marketing purposes.

Please note marketing preferences you set within NatWest Accelerator apply to Accelerator communications only and will not affect any marketing preferences you have set in respect of your other NatWest products or services. If you hold NatWest products you can review your marketing permissions on the mobile app or online banking.” Marketing preferences can be amended at any time in the “profile” section of NatWest Accelerator, or via unsubscribe button on emails.

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 change your preferences in the Accelerator App or can tell us at any time by contacting us at **03457 888 444**. Overseas number **+44 3457 888 444**, Relay UK **18001 03457 888 444**, via online banking, webchat or in branch.

## **11 Communications about your account**

11.1 We will contact you with information relevant to the operation and maintenance of your Accelerator App account (including updated information about how we process your personal information), by a variety of means including via electronic message, post and/or telephone. If at any point in the future you change your contact details you should tell us promptly about those changes by updating your profile within the Accelerator App settings.

## **12 How long we keep your information**

12.1 By providing you with products or services, we create records that contain your information, such as customer profile records and activity records. Records can be held on a variety of media (physical or electronic) and formats.

12.2 We manage our records to help us to serve our customers well (for example for operational reasons, such as dealing with any queries relating to your account) and to comply with legal and regulatory requirements. Records help us demonstrate that we are meeting our responsibilities and to keep as evidence of our business activities.

12.3 Retention periods for records are determined based on the type of record, the nature of the activity, product or service, the country in which the relevant NatWest group company is located and the applicable local legal or regulatory requirements. 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 we can produce records as evidence, if they are needed.

12.5 If you would like more information about how long we keep your information, please contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

## **13 Security**

We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. For more information about the steps we are taking to protect your information please visit <https://personal.natwest.com/personal/fraudand-security.html> or contact us at **03457 888 444**. Overseas number: **+44 3457 888 444**. Relay UK **18001 03457 888 444**.

## **14 Automated Processing**

14.1 In the course of providing NatWest Accelerator to you we may process your personal information by automated means, to include profiling. This means is that we will use computer software or predictive analysis to automatically evaluate your activity within NatWest Accelerator.

14.2 Profiling is a useful tool as we try to understand our users and their specific needs in more detail. It gives us the opportunity to use personal information to tailor our marketing and product offering. However, you do have rights and entitlements in relation to automated processing and these are covered in Table A above. You also have the right to opt out of profiling for marketing purposes.

## **15 Cookies**

15.1 We use a variety of different technologies on our website. These technologies include (but are not limited to) cookies, scripts, fonts and images. Some of these are considered as necessary for us to deliver the website to you. Others are used to enhance our understanding of how you use our website, or to assist in our marketing activities.

15.2 A “cookie” is a small text file that’s stored on your computer, smartphone, tablet, or other device when you visit a website or use an app. They contain specific information relating to your use of our web site or app, such as login credentials; your preference settings or tracking identifiers.

15.3 Cookies are set by our web server, your browser and the web servers of the third parties whose cookies we deploy on our websites and apps. They can be read, updated or deleted by those same servers each time you visit our web site, depending on the type of cookie.

15.4 Some cookies are deleted when you close your browser. These are known as session cookies. Other cookies (such as tracking cookies or authentication cookies) remain on your device until they expire, or you delete them from your browser. These are known as persistent cookies and enable us to remember things about you as a returning visitor. This website uses persistent cookies.

15.5 Some cookies can impact your fundamental rights to privacy and the protection of your data. As such, we require your consent before they can be accessed or stored on your device. For this reason, we limit our use of cookies as explained below.

15.6 We use cookies and other similar technologies to:

- Provide products and services that you request and to provide a secure online environment
- Give you a better online experience and track website performance
- Help us make our website more relevant to you.

Here we explain a bit more about each of these types and how you can control their use.

15.7 **Strictly necessary cookies** - These are cookies that are essential for the safe operation of our website and for us to provide a product or service you have requested. Without these cookies we are unable to provide some products or services that you might request. This category of cookies cannot be disabled. These cookies are used to:

- Enable you to log into the secure areas of our website
- Track errors on our website and enable us to report incidents to our regulators
- Keep our website secure
- Record your preference regarding our use of cookies on your device.

15.8 **Functionality cookies** - These cookies remember your preferences and tailor the website to provide enhanced features. Without these cookies, we cannot remember your choices or personalise your online experience. We use this type of cookie to:

- Remembering relevant information as you browse from page to page to save you re-entering the same information repeatedly.
- Provide enhanced features, such as playing videos or allowing you to post a comment.

15.9 If you want to restrict or block the cookies on our site, you can do this at any time on our website. The tool will record when you have consented to our use of cookies and will ask for consent again periodically to ensure users stay up to date with changes to our cookie and privacy policies. Essential cookies cannot be disabled. The tool specifically controls the cookies set by using our website (including third party cookies set by us) and it cannot be used to block cookies on third-party websites which are on your device and which we have not set.

15.10 Browser Settings – Many of the cookies used on our website can be enabled or disabled through your browser settings. The ‘help’ function within your browser should tell you how, or you can find out by visiting: <https://allaboutcookies.org/how-to-clear-cookies> or search the internet for other independent information on how to delete cookies. You can set your browser to delete all past cookies and to disallow third-party cookies.



15.11 To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <https://www.youronlinechoices.com/uk/your-ad-choices>. Alternatively, you can search the internet for other independent information on cookies.

15.12 If you delete cookies relating to this website, we will not remember things about you, and you will be treated as a first-time visitor the next time you visit the site.

#### **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. Your information may be shared with and processed by other NatWest group companies. We want to ensure that you fully understand how your information may be used. We have described the purposes for which your information may be used in detail in a table below:

<b>A Contractual necessity</b>
<p>We may process your information where it is necessary to enter into a contract with you for the provision of the NatWest Accelerator or to perform our obligations under that contract (the user Terms &amp; Conditions). 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 account and/or provide this service to you. This may include processing to:</p> <p>a) allow you to register and maintain access to your account using account information such as your name, email address, log in information and data relating to your use of the App.</p> <p>b) manage and maintain our relationship with you and for ongoing customer service. This may involve sharing your information with other NatWest group companies to improve the availability of our services;</p> <p>c) communicate with you about your account(s) or the products and services you receive from us. This may include delivery of updates to terms and conditions, investigating and resolving complaints and remediation of errors on your account.</p>

<b>B Legal obligation</b>
<p>We may process your information to comply with legal obligations which require us to preserve or disclose certain information in the context of a valid legal request from law enforcement agencies, courts or regulators. The data we may be required to disclose will depend on the nature of the request.</p>

<b>C Legitimate interests of the bank</b>
<p>We may process your information where it is in our legitimate interests do so as an organisation or where it is in the legitimate interest of another NatWest group company or a third party.</p> <p>a) We (and other NatWest group companies) may process your information in the day-to-day running of our business as a group of companies, to manage our business and financial affairs and to protect our customers, employees and property. It is in our and their 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:</p> <p>(i) to monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;</p> <p>(ii) ensure business continuity and disaster recovery and respond to information</p>

### C Legitimate interests of the bank

- (iii) technology and business incidents and emergencies; 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) to make decisions about our customers and the continued operation of their accounts and;
- (v) protect our legal rights and interests and those of the NatWest group of companies;

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 where you have not opted out (or where you have provided your permission). This may include details of other products or services provided by us, other NatWest Group companies or other selected third parties, 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), in the Accelerator App or by email, SMS or post. We will not share your information with third parties for their own marketing purposes;
- (iii) understand our customers' actions, behaviour, preferences, expectations and feedback 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 group companies;
- (iv) monitor the performance and effectiveness of the Accelerator App;
- (v) assess the quality of our customer services and to provide staff training. Calls to our service centres, video calls and communications to our mobile and online helplines may be recorded and monitored for these purposes;
- (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) organise educational events to increase awareness of scams and frauds.

c) It is in our interest as a business to manage our risk. It is also in our interest to protect our business and customers and others by preventing financial crime, fraud and other criminal activities. This may include processing your information to:

- (i) for risk reporting and risk management;
- (ii) responding to and investigating complaints both raised directly to us, or raised through a third party such as a regulatory body;

### D Consent

Our activities where we may rely on your consent include where we process certain special categories of data (as described in Section 3); where we use cookies or similar technologies (as described in Section 4); or where we collect your permission for sending marketing (as described in Section 10) or any other processing where we request your consent.

