

Early Careers: Privacy Notice



We regularly update this document. Make sure you have the latest version by downloading it from the intranet.

Last update: September 2021

Privacy Notice

1. Who we are

This Privacy Notice (the “Privacy Notice”) applies to all personal information processing activities carried out by National Westminster Bank Group Plc and its subsidiaries (together “Natwest”). In this notice, references to “we”, “us” or “our” are references to Natwest. Natwest Holdings Ltd is the data controller of your personal information in relation to the processing activities described in this Privacy Notice. Our Data Protection Officer can be contacted by emailing HREmployeePrivacy@rbs.co.uk.

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. “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 information we process

We will collect and process various categories of personal information to understand the candidates who engage with us. We will limit the collection and processing of information to information necessary to understand the demographics of the participants for the purposes of planning our recruitment activities, any future events we may run and to contact you to about opportunities which may be relevant to you (only where you have consented to receive these communications):

- basic personal information, including name and contacting details;
- gender;
- education information;
- marketing preferences.

We will only process special categories of information for diversity monitoring where we’ve obtained your explicit consent. This includes information about racial or ethnic origin. We will only collect special category information for other purposes in limited circumstances and where this is permitted by law.

3. Legal Basis for Processing

Purpose of Processing	Lawful Basis for Processing
General Recruitment Activities including Planning of future events/sessions	Article 6 (1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by the Bank as a prospective employer
Analysis of demographic information to understand how to improve engagement and audience reach	Article 6 (1)(f) of the GDPR - processing is necessary for the purposes of the legitimate interests pursued by the Bank as a prospective employer.

	<p>Article 9(2)(a) of the GDPR – the data subject has given explicit consent to the processing of his or her personal data for one or more specific purposes.</p> <p>You can withdraw this consent at any time by contacting EarlyCareersAttraction@rbs.co.uk</p>
Contacting you by email or text about future opportunities	<p>Article 6(1)(a) of the GDPR – the data subject has given consent to the processing of his or her personal data for one or more specific purposes.</p> <p>You can withdraw this consent at any time by contacting EarlyCareersAttraction@rbs.co.uk or clicking unsubscribe.</p>

4. Your rights

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, or if you have any queries about how we use your personal information which are not answered here, please contact us at: EarlyCareersAttraction@rbs.co.uk.

Data Subject Right	Description
Access	You have a right to get access to the personal information we hold about you. If you would like a copy of the personal information we hold about you, please contact us at: EmployeeSARsManchester@rbs.co.uk .
Rectification	You have a right to rectification of inaccurate personal information and to update incomplete personal information. If you would like to submit a rectification request, please contact us at: ROI-HREmployeePrivacy@natwest.com .
Erasure	<p>You have a right to request that we delete your personal information. You may request that we delete your personal information if you believe that:</p> <ul style="list-style-type: none"> • we no longer need to process your information for the purposes for which it was provided; • we have requested your permission to process your personal information and you wish to withdraw your consent; or • we are not using your information in a lawful manner. <p>If you would like to submit an erasure request, please contact us at: ROI-HREmployeePrivacy@natwest.com.</p>

Objection (Marketing)	You have a right to object at any time to processing of your personal information for direct marketing purposes. You can change your preferences at any time by contacting: EarlyCareersAttraction@rbs.co.uk or clicking unsubscribe
Portability	Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format. If you would like to submit a portability request, please contact us at: ROI-HREmployeePrivacy@natwest.com.
Automated Decision Making	We do not use any solely on automated decision-making as part of our activities for Early Careers. In the event that the bank relies solely on automated decision-making that could have a significant impact on you (e.g. automated psychometric and behavioural testing), we will provide you an opportunity to express your views and will provide any other safeguards required by law.
Restriction	Where possible, we will restrict the processing your personal information if you have raised an objection or erasure request in relation the processing of your personal information whilst we review your query.
Complaints	You have a right to lodge a complaint with the relevant supervisory authority or data protection regulator. For more information, please see Appendix A for a list of contact details for your local regulator.

5. Who we share your information with

Your information will only be shared with and processed by other suppliers who have been engaged to support us with our recruitment activities. For example:

- Companies who provide recruitment and candidate interview and assessment services to the bank;
- Academic institutions c (Universities, colleges, etc.);
- Third-party suppliers (or potential suppliers), who provide services on our behalf.

Some of these third parties and associates will be located outside the European Economic Area (“EEA”). Where we transfer your personal information outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal information will be protected by us in the EEA. This can be done in a number of ways, for instance the country that we send the information to might be approved by the European Commission; or the recipient may have signed up to a contract based on “Standard Contractual Clauses” approved by the European Commission, obliging them to protect your personal information. In other circumstances the law may permit us to otherwise transfer your personal information outside the EEA. In all cases, however, we will ensure that any transfer of your personal information is compliant with applicable data protection law.

6. How long we keep your information for

We typically retain your personal information for up to two years, but retention periods may vary and 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 and our legal obligations (laws or regulation may set a minimum period for which we have to keep information). Retention periods may be changed from time to time based on business or legal and regulatory requirements.

For your information we have provided an extract of the relevant entry in our Records Retention Schedule below:

HR1500 Employee Recruitment & Selection			
Jurisdiction	Baseline	US	Japan
Trigger	The retention period begins the date the record is created	Active for current employees. The retention period begins upon termination of employment.	Active for current employees. The retention period begins upon termination of employment.
Period	2 years	Active + 6 years	Active + 3 years

7. Security

We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. Our systems are protected to ensure that unauthorised or unlawful processing of personal information, accidental loss or destruction of, or damage to, personal information does not occur. This is done in accordance with the NatWest Group Security Policy.

Appendix A: Data Protection Regulator Websites

Country	State (if applicable)	Local Data Protection Authority	Website
Finland	-	The Office of the Data Protection Ombudsman	https://tietosuoja.fi/en/home
France	-	The National Commission on Informatics and Liberty – Commission nationale de l’informatique et des libertés (CNIL)	https://www.cnil.fr/en/home
Gibraltar	-	Gibraltar Regulatory Authority	http://www.gra.gi/data-protection
Germany	Federal	Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit	https://www.bfdi.bund.de/DE/Home/home_node.html
Germany	Baden-Württemberg	Der Landesbeauftragte für den Datenschutz Baden-Württemberg	https://www.baden-wuerttemberg.datenschutz.de/
Germany	Bayern	Der Bayerische Landesbeauftragte für den Datenschutz	https://www.datenschutz-bayern.de/
Germany	Berlin	Berliner Beauftragte für Datenschutz und Informationsfreiheit	https://www.datenschutz-berlin.de/
Germany	Brandenburg	Die Landesbeauftragte für den Datenschutz und für das Recht auf Akteneinsicht Brandenburg	http://www.lda.brandenburg.de/
Germany	Bremen	Die Landesbeauftragte für Datenschutz und	https://www.datenschutz.bremen.de/

		Informationsfreiheit Bremen	
Germany	Hamburg	Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit	https://www.datenschutz-hamburg.de/
Germany	Hessen	Der Hessische Datenschutzbeauftra gte	https://datenschutz.hessen.de/
Germany	Mecklenburg - Vorpommer n	Der Landesbeauftragte für Datenschutz und Informationsfreiheit Mecklenburg- Vorpommern	https://www.datenschutz-mv.de/
Germany	Niedersachs en	Die Landesbeauftragte für den Datenschutz Niedersachsen	http://www.lfd.niedersachsen.de/startseite/
Germany	Nordrhein- Westfalen	Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen	https://www.ldi.nrw.de/
Germany	Rheinland- Pfalz	Der Landesbeauftragte für den Datenschutz und die Informationsfreiheit Rheinland-Pfalz	https://www.datenschutz.rlp.de/de/startseite/
Germany	Saarland	Unabhängiges Datenschutzzentrum Saarland	https://datenschutz.saarland.de/
Germany	Sachsen	Der Sächsische Datenschutzbeauftra gte	https://www.saechsdsb.de/
Germany	Sachsen- Anhalt	Landesbeauftragter für den Datenschutz Sachsen-Anhalt	https://datenschutz.sachsen-anhalt.de/nc/datenschutz-sachsen-anhalt/
Germany	Schleswig- Holstein	Unabhängiges Landeszentrum für	https://www.datenschutzzentrum.de/

		Datenschutz Schleswig-Holstein	
Germany	Thüringen	Der Thüringer Landesbeauftragte für den Datenschutz und die Informationsfreiheit	https://www.tlfdi.de/tlfdi/
Greece	-	The Hellenic Data Protection Authority (HDPa)	http://www.dpa.gr/
Guernsey	-	The Office of the Data Protection Authority, Guernsey	https://odpa.gg/
Isle of Mann	-	The Information Commissioner, Isle of Mann	https://www.inforights.im/
Italy	-	The Italian Data Protection Authority – Garante per la protezione dei dati personali	http://www.garanteprivacy.it/
Jersey	-	Jersey Officer of the Information Commissioner	https://jerseyoic.org/
Luxembou rg	-	The National Data Protection Commission – Commission Nationale pour la Protection des Données (CNPd)	https://cnpd.public.lu/en.html
The Netherland s	-	The Dutch Data Protection Authority – Autoriteit Persoonsgegevens	https://autoriteitpersoonsgegevens.nl/
Norway	-	The Norwegian Data Protection Authority	https://www.datatilsynet.no/
Poland	-	The Personal Data Protection Office – Biuro Generalnego	https://uodo.gov.pl/

		Inspektora Ochrony Danych Osobowych	
Republic of Ireland	-	The Data Protection Commission of Ireland	https://www.dataprotection.ie/
Spain	-	The Spanish Data Protection Agency - Agencia Española de Protección de Datos	https://www.agpd.es/portalwebAGPD/index-iden-idphp.php
Sweden	-	The Swedish Data Protection Authority - Datainspektionen	https://www.datainspektionen.se/
Switzerland	-	The Federal Data Protection and Information Commissioner (FDPIC)	https://www.edoeb.admin.ch/
United Kingdom	-	The Information Commissioner's Office	https://ico.org.uk/